

TSD File Inventory Index

US EPA RECORDS CENTER REGION 5



1000374

Date: June 15, 2007

Initial: CMK/nerad

Facility Name: <u>Techallage Company (Illinois)</u>			
Facility Identification Number: <u>ILD 005 P78 975</u>			
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.2 Reports		.3 RFI Program Reports and Oversight	
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Total 35

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.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order <i>D. 5.1 - D. 5.2</i>	1
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.3 CMS Workplan <i>D. 3.3</i>	1	.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	1
.5 Stabilization		G.1 Risk Assessment	
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1			

Note: Transmittal Letter to Be Included with Reports.
Comments: _____



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

April 11, 2007

David Novitski
Thelen Reid & Priest LLP
333 South Hope Street, Suite 2900
Los Angeles, California 90071-3048

Re: Techalloy Company facility in Union, Illinois

Dear Mr. Novitski:

This is to let you know that the Techalloy facility matter is being transferred to attorney Karen Peaceman in my office. I will be on leave for an extended period of time.

Therefore, please send your response to my March 20th letter to Ms. Peaceman. EPA remains interested in confirming Techalloy (and Central Wire's) compliance with the financial assurance regulations, and in receiving the other information that I requested.

Ms. Peaceman has the same mailing address as do I:

U.S. Environmental Protection Agency
Region 5
77 W. Jackson Blvd. (C-14J)
Chicago, IL 60604-3590

Her telephone number is 312/353-5751 .

Sincerely,

A handwritten signature in black ink, appearing to read "Jacqueline Miller".

Jacqueline Miller
Associate Regional Counsel

cc: ✓ B. Sundar, U.S. EPA
K. Peaceman, U.S. EPA

Case Conclusion Data Sheet

(NOTE: PLEASE DO NOT LEAVE SPACES BLANK -- PUT N/A IF NOT APPLICABLE)

Name: J. Kline

Phone: 6-7167

Date: 10/1/99

A. Case and Facility Background - **ORC LEAD**

1. ORC DOCKET MATTER NUMBER: 05-91-0289

2. Court Docket / Regional Hearing Clerk Docket Number: RCRA V-W-007-93

3. Case name: Techalloy Company, Inc.

(Add Defendants/Respondents if other than case name):

Information for one Facility (If more, attach additional pages.)

4.(a) EPA-FINDS facility-identification-number:

4.(b) EPA Program ID for the facility: ILD 005 178 975

5. Facility Name: Techalloy

6. Facility Address / Street: 6509 Olson Road City: Union St: IL Zip:60180

7.(a) Primary 4-digit SIC-code: 3452 (b) Other 4-digit SIC-codes:

8. Dun & Bradstreet number (not applicable for CERCLA actions):

9.(a) EPA Lead Attorney: Jacqueline Kline

9.(b) EPA Program Contact: Michael Valentino

10. Statute(s) and Section(s) violated (NOT C.F.R. or U.S.C.): RCRA 3008(h)

11. ACTION TYPE

☐ (a) Consent decree or court order resolving a civil judicial action - NOTE: when CD entered, send copy of CD and accounts receivable form to ORC DOCKET clerk, and to Comptroller Branch.☐ (b) Administrative penalty order (with/without injunctive relief)☐ (c) Superfund administrative order for cost recovery☐ (d) Federal facility compliance agreement (not incl. RCRA matters)☐ (e) Field citation☒ (f) Administrative compliance order (AOC for Corr. Measures Implementation)

12. ACTION DATE: Issued / filed: N/A

Date CD lodged: N/A

Final order: 9/30/99

13. Authorizing section for administrative actions (common statute name, NOT C.F.R. or U.S.C.): RCRA §3008(h)

14. Was this a multi-media action? ☐ Yes ☒ NoCheck all that make this action multi-media: ☐ inspection ☐ complaint ☐ settlement ☐ SEP15. Was this action a part of a geographic initiative? ☒ No ☐ Yes: Which? _____16. Was the Agency activity taken in response to Environmental Justice concerns? ☐ Yes ☒ No17. Was Alternative Dispute Resolution used in this action? ☐ Yes ☒ NoB. Compliance Actions (Non-SEP related) - **PROGRAM LEAD**

18. What action did violator accomplish prior to receipt of settlement/order or will take to return to compliance or meet additional requirements? This may be due to settlement/order requirements or otherwise required by statute or regulation (e.g. actions related to an APO which did not specify compliance requirements). Where separate

A.T. Kearney, Inc.
222 West Adams Street
Chicago, Illinois 60606
312 648 0111
Facsimile 312 223 6200

Management
Consultants

023
RZ2-R05035.01-ID-016

September 17, 1996

ATKEARNEY

Mr. William Buller
US Environmental Protection Agency
RCRA Enforcement Branch
Region 5 - DRE-8J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Reference: EPA Contract No. 68-W4-0006; EPA Work Assignment No. R05035;
Techalloy Company, Inc.; Union, Illinois; EPA ID No. ILD005178975;
Corrective Action Document Reviews and Field Oversight; Field
Oversight Summary Report; Task 04 Deliverable

Dear Mr. Buller:

This letter presents A.T. Kearney's Summary Report for oversight activities performed on September 6, 1996 at the above-referenced facility. The report provides a summary of the oversight observations made during your visit to the Techalloy facility with Mr. John Koehnen of A.T. Kearney. At your request, this summary report is presented in letter format and does not include field notes or photographs since none were taken. The primary purpose of the oversight was to observe first-hand the final elements of the installation of the groundwater treatment system extraction well and associated field activities.

Mr. Buller and Mr. Koehnen arrived at the Roy F. Weston Inc. (Weston) field trailer location at approximately 0950 following a driving tour of the immediate area and the Techalloy facility. At this time, Mr. Buller and Mr. Koehnen met with Mr. Dale Buckholtz, the Weston field remediation engineer. Mr. Buckholtz indicated that the construction of the treatment facility had encountered an obstacle when the depth of the excavation for the foundation was found to be in direct contact with the groundwater table. Mr. Buckholtz further indicated that this problem necessitated design modifications which included a larger sump for the treatment facility and additional design modification which were still under review by Weston engineers.

Following a review of the treatment system construction, Mr. Buckholtz indicated that the additional field personnel had left the immediate area to fill the water tanks on the drill rig with potable water from the nearby city water source. The field team returned at approximately 1050 and Mr. Koehnen and Mr. Buller proceeded to the extraction well location and met with Mr. Jameel Ahmed of Weston, the field geologist, and three drilling personnel from Phillips Environmental Drilling (T. Marlo, J. Bignall, and D. Gotto). At this time, the drilling of the extraction well resumed, reaching a depth of approximately 80 feet below ground surface (bgs) by 1135. However, during retraction of the augers, the lower portion of the well borehole collapsed and filled in to approximately 70 feet bgs.

Since the original test hole, located approximately ten feet west of the current extraction well location, had exhibited similar problems, a "Johnson Revert" compound was being used during the entire drilling process for the extraction well. This material acts like a bentonite grout, filling in the void spaces and acting as a binding agent with the hope of alleviating flowing sands, or in this case, flowing pea gravel size rocks. The revert material is a self-degrading product, unlike bentonite, and does not persist in the well allowing for relatively easy flushing during development activities. Since the borehole was still caving in, the drillers opted to increase the ratio of revert used in the drilling fluid and let this material cycle through the borehole during lunch. At 1157, Mr. Buller and Mr. Koehnen left the site for lunch.

At 1247, while returning from lunch, Mr. Buller and Mr. Koehnen observed the location of the recently installed well nest which was located west of the current groundwater contaminant plume, immediately adjacent and to the west of the farmland located west of Union Road. Following this, Mr. Buller and Mr. Koehnen returned to the site of the extraction well. The well boring was again advanced through the slough to approximately 80 feet bgs. This action did not ultimately fulfill the goal of an open borehole to a depth of approximately 75 feet bgs. Since the borehole continued to collapse several feet upon casing retraction, drilling continued to approximately 90 feet bgs to allow the borehole to cave in several feet, yet still allow the well screen to be set at approximately 75 feet bgs. This technique proved to be successful. Since the upper aquifer is underlain by approximately 30 feet of clay, drilling past the upper aquifer would not be expected to pose potential problems with cross-contamination. Mr. Buller concurred with these activities.

Following the full retraction of the casings at approximately 1540, the well screens were prepared for placement. The screens consisted of three, eight inch diameter, 15-foot long sections of stainless steel screens of number 10 slot size. The screens were set into the borehole and sequentially connected for a total screen length of 45 feet. The screened length was followed by a solid standpipe approximately 22 feet in length. This pipe consisted of a standard steel pipe welded to a threaded adaptor for connection to the

Mr. William Buller
September 17, 1996
Page 3

screens. The subsequent addition of another 20 foot length of steel piping completed the well installation. This pipe was welded to the top of the previous length of pipe and the screen and casing were lowered to the bottom of the borehole. The final depth of the borehole and screen bottom was determined to be approximately 75 feet.

After the well screen was set at approximately 1720, the placement of the sand pack was initiated. It was determined that the thickness of the drilling fluid hampered the settling of the sands of the filter pack. Therefore, additional water was pumped into the borehole to dilute and displace the drilling fluid currently in the borehole. Following this procedure, the placement of the filter pack resumed at approximately 1745. It was originally expected to take approximately two, 50-pound bags of sand to place a one-foot filter pack. However, since the drilling had resulted in the removal of a large quantity of coarse, pea-sized gravel from the annular space in the lower portion of the borehole, the amount of sand required to place the filter pack appeared to be almost double the originally expected amount. At approximately 1830, after the placement of 20 bags of sand and the subsequent rise in the filter pack of only four feet, Mr. Buller and Mr. Koehnen left the site for the day. Mr. Ahmed had indicated that the driller would be returning the following day (Saturday) to finish the well so that the well could be developed early the following week.

During the oversight activities, Mr. Koehnen did not note any procedures, activities or equipment which deviated from the approved work plan or would be expected to cause concerns with installation of the extraction well. However, due to the concerns noted resulting from the depth to groundwater near the treatment system, it appears that the system will likely not be built in accordance with the technical specifications originally presented. Since the degree to which modification will be made have not yet been determined, no assessment as to the adequacy of the modifications can be made at this time.

Please feel free to contact me or the A.T. Kearney Work Assignment Manager, Mr. John Koehnen, at (312)223-6253 if you have any questions.

Sincerely,



Patricia Brown-Derocher
Regional Manager

Enclosure

cc: F. Norling, EPA Region 5
W. Jordan/Central Files
J. Koehnen
A. Williams

HANDLER ID: 1410101511718915

FACILITY NAME: Techology - Union

DATE: 11/13/98

INSTRUMENT INFORMATION:

INSTRUMENT TYPE: A C D U O P M N J S V Z

RESP. AGENCY: EPA STATE JOINT

ISSUANCE DATE: / /

RESP. PROG: RCRA CERCLA-(Superfund)

RESP. SECT: REB RPB OTHER

RESP. PER: R5112, STATE, ATTORNEY

EFFECTIVE DATE: / /

LEG. AUTH CODE: A B C D E F G H U

IF U, LEG. AUTH. CIT.

REVOCATION DATE: / /

REPOSIT. INFO: N/A REQ/EST REQ/NOT EST

AREA INFORMATION:

AREA SEQUENCE NUM: /

AREA DESCRIPTIONS:

PRE-RFI RELEASES: GW SW SOIL AIR

POST-CMS CONSTITUENT CODE:

POST-CMS REMEDY CODE:

POST-CMS TYPE OF MEDIUM: A G S N

STAGE EVENT INFORMATION: HDOTRS DESCRIPTIONS

			SEQ. NUM	SCHEDULED DATES	ACTUAL DATES	STATUS CODES
RFA	CA010	RFA INITIATION.....	/	/	/	RF/ PA/
	CA050	RFA COMPLETED.....	/	/	/	/
Pre-	CA060	NOTICE OF CONTAMINATION.....	/	/	/	/
RFI	CA070	DETERMINATION OF NEED FOR RFI..	/	/	/	YE/ NO/
	CA075	CA PRIORITIZATION.....	/	/	/	HI/ ME/ LO/
RFI	CA100	RFI IMPOSITION.....	/	/	/	DC/
	CA110	RFI WORKPLAN RECEIVED.....	/	/	/	/
	CA120	RFI WKPLAN MOD. REQ. BY AGENCY.	/	/	/	/
	CA140	RFI WKPLAN NOTICE OF DEFICIENCY	/	/	/	/
	CA150	RFI WORKPLAN APPROVED.....	/	/	/	/
	CA155	RFI SUP. INFO REQ. BY AGENCY...	/	/	/	/
	CA160	RFI SUP. INFO, RECEIVED.....	/	/	/	/
	CA170	RFI SUP. INFO DEEMED SATISFACT.	/	/	/	/
	CA180	RFI IMPLEMENTATION BEGUN.....	/	/	/	/
	CA190	RFI REPORT RECEIVED.....	/	/	/	/
	CA195	RFI PROGRESS REPORTS RECEIVED..	/	/	/	/
	CA200	RFI APPROVED.....	/	/	/	/
Hdqtr	CA210	CA RESP.REFERRED TO NON-RCRA...	/	/	/	SF/ OT/
CA	CA225	STABILIZATION METHOD EVALUATION	/	/	/	YE/ NR/ NF/ IN
CMS	CA250	CMS IMPOSITION.....	/	/	/	/
	CA260	CMS WORKPLAN RECEIVED.....	/	/	/	/
	CA270	CMS WKPLAN MOD. REQ. BY AGENCY.	/	/	/	/
	CA300	CMS WORKPLAN APPROVED.....	/	/	/	/
	CA305	CMS SUP. INFO REQ. BY AGENCY...	/	/	/	/
	CA310	CMS SUP. INFO. RECEIVED.....	/	/	/	/
	CA320	CMS SUP. INFO DEEMED SATISFAC..	/	/	/	/
	CA330	CMS IMPLEMENTATION BEGUN.....	/	/	/	/
	CA340	CMS REPORT RECEIVED.....	/	/	/	/
	CA345	CMS PROGRESS REPORTS RECEIVED..	/	/	/	/
	CA350	CMS APPROVED.....	/	/	/	/
	CA370	PETITION FOR NO FUR.ACTION REC.	/	/	/	/
	CA375	DCS.ON PETITION FOR NO FUR.ACT.	/	/	/	/
	CA380	DTE PUB.NOTICE PROPOSED REMEDY.	/	/	/	/
CMI	CA400	DTE FOR REM.SELECT(CMI IMPOSED)	/	/	/	/
	CA410	DATE TO SUBMIT REMEDY DESIGN...	/	/	/	/
	CA450	CM DESIGN APPROVED.....	/	/	/	/
	CA460	COST EST. FOR REMEDY RECEIVED..	/	/	/	/
	CA470	FINANCIAL ASSUR.FOR REMEDY DEMO	/	/	/	/
	CA500	CMI WORKPLAN APPROVED.....	/	/	/	/
	CA510	DETER. OF TECH. IMPRACTIBILITY.	/	/	/	/
	CA550	CERT.OF REMEDY COMPLETION (CMI)	/	/	/	/
ENV	CA600	STAB. MEASURES IMPLEMENTED...*	01.3	05/11/98	05/11/98	EC/ GW/ OT/ SR
IND	CA650	STAB. CONSTRUCTION COMPLETED...	/	/	/	/
	CA725	HUMAN EXPOSURES CONTROLLED DET.	/	/	/	/
	CA750	RELEASE TO GW CONTROLLED DETER.	/	/	/	/
	CA999	CA PROCESS TERMINATED.....	/	/	/	/

* Upgrade of
6 W Extraction System
TURN OVER FOR REGIONAL EVENTS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD

CHICAGO, IL 60604-3590

OCT 10 2001

REPLY TO THE ATTENTION OF

DE-9J

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Mr. Henry Lopes
Vice President, Technical Operations
Techalloy Company, Inc.
370 Franklin Turnpike
Mahwah, New Jersey 07430-1074

AUTHOR

Re: Modification to Consent Order
Docket No.: R8H-5-99-008
Techalloy Company, Inc.
EPA ID No.: ILD 005 178 975

Dear Mr. Lopes:

Please find enclosed for your signature two copies of the Modification to the Administrative Order on Consent (Docket No.: R8H-5-99-008).

After your review, please sign both copies of the document and then return both of them to me. I will then forward the documents to appropriate U.S. EPA signatories and return a fully executed original copy to you for your files.

If you have any questions or concerns regarding this matter, please contact me at (312) 886-6194. Thank you for your cooperation in this matter.

Sincerely yours,

Allen T. Wojtas
Project Coordinator

cc: Carlos Serna, Integreyted Consultants w/o encl.

1/27/00

Jacqueline:

I have finally had a chance to meet w/ Techalloy and their contractor today. I also had a chance to review some background info on the project.

Enclosed, you will find a copy of the proposed schedule change. This has already been approved (informally) by Mike V and our management. In looking at the Order, I do not think an Order Modification is required. I've asked Techalloy to propose the schedule change in writing and justify the reasons. We can respond to their letter w/ our concurrence. These two letters and the amended schedule can then be appended to the Order.

We also don't need to rewrite the SOWs. The work remains the same. Only the order of implementation has changed. Please review & let me know what you think.

Also, there is no document called the Final Design. The SVE/MS design is due in Feb.

Thanks,

Allen

66194

C2

Law Offices of
Donovan Leisure Newton & Irvine
30 Rockefeller Plaza
New York, N.Y. 10112

DONOVAN LEISURE, ROGOVIN, HUGO & SCHILLER
1250 TWENTY-FOURTH STREET, N.W.
WASHINGTON, D.C. 20037-1124
TELEPHONE: 202-467-8300
FAX: 202-467-8484

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DONOVAN LEISURE NEWTON & IRVINE
333 SOUTH GRAND AVENUE
LOS ANGELES, CALIFORNIA 90071
TELEPHONE: 213-253-4000
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DONOVAN LEISURE NEWTON & IRVINE
130 RUE DU FAUBOURG SAINT-HONORE
75008 PARIS
TELEPHONE: 1-42-25-47-10
FAX: 1-42-56-08-06

WRITER'S DIRECT DIAL NUMBER:
212-632 -3161

December 2, 1991

Ms. Jacqueline Kline
Office of Regional Counsel
United States Environmental
Protection Agency - Region 5
77 Jackson
Metcalf Bldg.
Chicago, Illinois 60610

RE: Techalloy Company, Inc.
ILD005 178 975

Dear Ms. Kline:

This letter will reflect that we had a discussion on Wednesday, November 27, 1991, with regard to the letter, dated on or about November 18, 1991, sent by Joseph Boyle, Chief, RCRA Enforcement Branch, Region 5 of the United States Environmental Protection Agency ("EPA") to Henry Lopes of Techalloy.

My understanding is that this letter constitutes an initial response by Techalloy within fifteen (15) days of the receipt of the letter from Mr. Boyle to Techalloy, as required, and reflects that after making inquiries, you will contact me concerning the future course of action to be taken by EPA.

As I mentioned to you on the telephone, it is Techalloy's desire to continue to work cooperatively with the Illinois Environmental Protection Agency, under a voluntary clean up program to clean up the groundwater in the vicinity of the Union plant.

Thank you very much for your cooperation.

Very truly yours,


James J. Periconi

cc: Mr. Joseph M. Boyle

RCRA INSPECTION REPORT

USEPA #: IL D005178975 | EPA #: 1110900003
 Facility Name: Techalloy Illinois Inc. | Phone #: 815-423-2131
 Street Address: Olson + Jefferson | County: McHenry
 City: Union | State: IL | Zip: 60180
 Region: 2 | Inspection Date: 11/6/92 | From: 10⁰⁰ To: 12³⁰
 Weather: 5°

TYPE OF FACILITY

Notified As: <u>G, T, S</u>		Regulated As: <u>G(T)S</u>	
LDF? <u>No</u>	HPV? <u>No</u>	90-Day F/U Required?:	YES <u> </u> NO <u>✓</u>

TYPE OF INSPECTION

CE: ✓ Sampling: Citizen Complaint: Closed: Other:
CME/O&M: Record Review: Follow-Up to Inspection of: Withdrawal:

NON-REGULATED STATUS N/A

SQG: _____ Claimed Nonhandler: _____ Other (Specify in Narrative): _____

PART A

Notification Date: 10/30/90, from (initial) or (subsequent) Notification.

Initial Part A Date: 11/18/80 Amended: 1/18/88

Part A Withdrawal requested: 1/1/88 Approved by (US)(IL) EPA: 1/1/88

PART 8 PERMIT APPLICATION *N/A*

Part B Permit Submitted: Y or N / / Final Permit Issued: / /

ENFORCEMENT N/A

Has the firm been referred to - USEPA: Y or N ___/___/___

Illinois Attorney General: Y or N ___/___/___ County State's Attorney: Y or N ___/___/___

ORDERS ISSUED *N/A*

CACO: ____/____/____ CAFO: ____/____/____ Consent Decree: ____/____/____
Federal Court Order: ____/____/____ State Court Order: ____/____/____ PCB Order: ____/____/____

TSD FACILITY ACTIVITY SUMMARY[illegible]

SUMMARY OF APPARENT VIOLATIONS

OWNER

OPERATOR

Name Teachalloy Illinois Inc
Address P.O. Box 423
City Union
State IL Zip 60180-0423
Phone # 815-923-2131

Name Terhally Illinois Inc.
Address Olsen + Jefferson
City Union
State IL Zip 60180
Phone # 815-923-2131

PERSON(S) INTERVIEWED

TITLE**PHONE #**

George Miller
and Carr

Maintenance Supervisor	815-923-2131
Treatment Room Operator	815-923-2131

INSPECTION PARTICIPANT(S)**AGENCY/TITLE****PHONE #**

Tlca Karsznay

LEPA-EPS

708-531-5900

PREPARED BY

AGENCY/TITLE**PHONE#**

Same

Area	Class	Section
CTH	II	725.115b
CTH	II	725.115d
CTH	II	725.173
LC	I	725.212a
CTH	I	725.291a
CTH	I	725.293a
CTH	II	725.295c

[illegible][illegible]

Facility Name: Valley Forge, Pa.
 USEPA #: 100-5178975
 IEPA #: 1110900003

WASTE DISPOSITION FORM

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #				On Annual Report for: (Circle if present; cross out if not present)				Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
			* On 8700-12	* On 3510-3	* 19 88	* 19 89	* 19 90							
Pickle liquor	acid cleaning bath	10-88	DEC2	DEC1	Y	Y	G	G	G	Ø	3,000 gal	12-11-91	Clean Harbors of Chicago, Ill.	
nickling rinse waters	nickling process and rinse area. Rinse water between acid baths	10-88	DEC2	DEC7	Y	Y	Ø	G	G	unknown*	15,000 gal 3 x 5000/mc	1-7-92	Chicago, IL	
HDS sludge	from bottom of rinsate tank	10-88	DEC2	DEC7	Y	Y	Ø	Ø	G	1/2 drum	2000 gal 2 mcs.	1-13-92		
Potassium Permanganate	pickling line (oxide breaker)	1-91	DEC1	DEC2	Y	Y	G	G	G	Ø	once every 10 yrs (may change)	1-13-92		
Phosphoric Acid	line cleaning	12-10-91	DEC1		Y	N	G	G	G	↓	1-3 drums 3 mcs.	1-13-92	Clean Harbors Braintree, MA	
Used Plating filters	filters used for filtering copper plating tanks	10-88	DEC3	FCC8	Y	Y	G	G	G	↓	110 gal/gr (as needed)	3-21-90	Cyanuric Detroit, MI	
Waste Cyanide Soln	rinse out of old copper coating system	before shipment	FCC6	DEC3	Y	Y	G	G	G	Ø	one time generation	1-25-91		
Cyanide Sludge	↓	↓	FCC1		Y	Y	G	G	G	↓	↓	1-27-91	↓	
Waste Petroleum Distillate	brightens wire on wire drying machines	↓	DEC1		N	N	G	G	G	Ø	2 drums/mo	1-13-92	Clean Harbors of Chicago, Ill.	
							G	G	G					

* All "NO" responses must be explained in narrative.

* quantity is not documented in operating record

Facility Name: 101 Hwy 111 N. L.
USEPA #: 11-111111-1
IEPA #: 1110900003

WASTE DISPOSITION FORM

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #				On Annual Report for: (Circle if present; cross out if not present)	Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition	
			* On 8700-12	* On 3510-3	* 19	* 19						
Used filter	Molybdenum Densitite coating process	1-1-90	N/A			G	G	G	Ø	unknown (filters lost a long time ago)	none (found prior to 1990)	Will be disposed of as a special waste
SP & Sludge	Soap coating on wire before drawing wire through dies	11-19-90	N/A			G	G	G	Ø	465 gal 2-3 yrs	3-8-90	Clean Harbors Chicago, IL
Waste oil	Oils from drawing heavier wires (high viscosity)	6-28-90	N/A			G	G	G	Ø	258 gal yr	1-13-92	Clean Harbors B. Ambree, ALA
* ↓	Water soluble oils from coating dies in machines		N/A			G	G	G	Ø	275 gal yr (varies)	3-6-91	Amber Oil Co. Milwaukee, WI
* ↓	from vehicle maintenance		N/A			G	G	G	6 drums	1430 gal yr	3-6-91	↓
						G	G	G				
						G	G	G				
						G	G	G				
						G	G	G				
						G	G	G				
* See narrative for further details						G	G	G				

*** All "NO" responses must be explained in narrative.**

NARRATIVE

Techalloy processes steel and nickel alloy rod. Unprocessed, hot-rolled rod is annealed and drawn into coils or spools of wire of varying strengths and diameters. A variety of coatings and cleaners are utilized in the production processes, including acidic and caustic cleaners, coating solutions, dyes, and rinses.

Hazardous Waste

Pickle Liquor (ADS liquid) - D002, D007

- from acid cleaning baths -- used to remove dirt or scale due to oxide build up on wires
- generate approximately 3,000 gallons, one to three times/mo.
- last manifested shipment on 12-11-91 to Clean Harbors of Chicago, Inc., Chicago, IL
- none on site

Pickling Rinse Waters - D002, D007

- from process and rinse area -- rinse coils between acid baths
- generate approximately 5,000 gallons three times/mo.
- last manifested shipment on 1-7-92 to Clean Harbors of Chicago, Inc., Chicago, IL
- amount on site is unknown -- the quantity in the storage tanks is not documented in the operating record

ADS Sludge - D002, D007

- from bottom of rinsate tank
- generation varies -- approximately 605 gallons/2 mos.
- last manifested shipment on 1-13-92 to Clean Harbors of Chicago, Inc., Chicago, IL
- 1/2 drum on site in hazardous waste accumulation area (see sketch and photo #6)

Potassium Permanganate - D001, D002, D007

- oxide breaker from pickling line
- generated once every 10 years -- generation may increase in the near future
- last manifested shipment on 1-13-92 to Clean Harbors of Chicago, Inc., Chicago, IL
- none on site

Phosphoric Acid - D007

- from cleaning line
- generate approximately 1-3 drums every 3 months
- last manifested shipment on 1-13-92 to Clean Harbors, Braintree, MA
- none on site

Techalloy Illinois Inc.
1110900003
January 16, 1992

Used Plating Filters - D003, F008

- generated from copper plating tanks (only waste generated from copper plating due to the installation of a new copper plating system)
- generate approximately 110 gallons/year or as needed
- last manifested shipment on 3-21-90 to Cyanokem, Detroit, MI
- none on site

Waste Cyanide Solution - F006, D003

- from rinsing out old copper coating system
- one time generation
- last manifested shipment on 1-25-91 to Cyanokem, Detroit, MI
- none on site

Cyanide Sludge - F006

- from cleaning out old copper coating system
- one time generation
- last manifested shipment on 1-29-91 to Cyanokem, Detroit, MI
- none on site

Waste Petroleum Distillate - D001

- brightens wire on wire drying machines
- generate approximately 2 drums/mo.
- last manifested shipment on 1-13-92 to Clean Harbors of Chicago, Inc., Chicago, IL
- none on site

Non-hazardous Waste

Used Filters

- from molybdenum disulfide coating process
- generation unknown -- one drum generated prior to 1990
- waste was never manifested off site -- used to be disposed of with general refuse, but will be manifested off as a special waste in the future
- none on site

SP-6 Sludge

- from cleaning the tank in which soap coating is put on wire before drawing the wire through dies
- generate approximately 165 gallons every 2-3 years
- last manifested shipment on 3-8-90 to Clean Harbors of Chicago, Inc., Chicago, IL
- none on site

Waste Oil - high viscosity

- from drawing heavier wires
- generate approximately 258 gallons/yr.
- last manifested shipment on 1-13-92 to Clean Harbors, Braintree, MA
- none on site

Techalloy Illinois Inc.

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January 16, 1992

Waste Oil

- water soluble oils from cooling dies in machines
- generation varies -- approximately 275 gallons/year
- last manifested shipment on 3-6-91 to Amber Oil Co., Milwaukee, WI
- none on site

Waste Oil

- from vehicle maintenance
- generate approximately 1,430 gallons/year
- last manifested shipment on 3-6-91 to Amber Oil Co., Milwaukee, WI
- 6 drums on site in waste oil accumulation area (see sketch and photo #7)

Hazardous Waste Units

T01 - Tank Treatment

- two 1,000 gallon neutralization tanks used for treating spent acids and rinsates from the pickling house.
- no longer in use -- has not operated since 11-8-88
- system has been disassembled and tanks are laying on the floor in the treatment room
- an approved closure plan is available
- closure is to be completed by 4-15-92

T04 - Container Treatment

- one 3,000 gallon tanker truck used for treating cyanide waste from the plating process by adding bleach
- no longer in use -- has not been used since 4-9-85
- an approved closure plan is available
- closure is to be completed by 4-15-92

S02 - Tank Storage

- two tanks (10,500 and 16,500 gallons) located in the pickling house -- accumulate rinsate waters from the pickling process
- identified as accumulation tanks in last years inspection
- according to Kevin Lesko, Permit Section, the spent acids and rinsates from the acid house which were treated in the T01 unit were not treated until they could be considered completely non-hazardous. There was still a chance of high concentrations of chromium in the material when it was returned to the acid tanks. This material then went back into the acid pits. Since the material was never treated until it was totally non-hazardous, Springfield made the determination that these pits held waste for greater than 90 days.
- the Part A has been amended to include these units
- secondary containment is required for these tanks
- units have been included in the latest closure plan, but this plan was not available on site at the time of the inspection
- closure to be completed by 4-15-92

Notes

Techalloy considers the two tanks located in the acid house to be accumulation tanks. According to information received during the inspection, it appears that these tanks are accumulation tanks, but Kevin Lesko, Permit Section, believes that these tanks should be considered storage. Techalloy amended their Part A and addressed these units in their most current closure plan as S02.

Techalloy has not determined the correct treatability group for any of their wastes. They are classifying all of the waste as wastewater as opposed to non-wastewater on their land disposal restriction notices. They were informed of their mistake at the time of the inspection. They will determine the correct treatability group for their wastes and classify it properly in the future.

All molybdenum disulfide filters will be manifested in the future as opposed to disposal with the general refuse.

The waste petroleum distillate (D001) shipped to Clean Harbors was previously shipped off as non-hazardous waste oil to Amber Oil Co. Future shipments will be tested and may be shipped off as non-hazardous.

Techalloy appears to be a fully regulated generator of hazardous waste and a storage facility.

Apparent Violations

These violations were cited under 722.134a during the last inspection (March 22, 1990). Since that time, these tanks have changed from accumulation to storage tanks, therefore the violations must now be cited under Part 725. 722.134a has been resolved.

- 725.291a - there is no written tank assessment for the storage tanks
- 725.293a - the storage tanks do not have secondary containment

Cited January 16, 1992.

- 725.115b - the frequency of inspections of the storage tanks are not being documented in an inspection schedule
- 725.115d - results of inspections of the storage tanks are not being documented
- 725.173 - the quantity of waste in storage tanks is not being documented in an operating record
- 725.212a - the most current closure plan which includes the storage tanks was not on site at the time of the inspection
- 725.295c - tank inspections are not being documented

SOIL SAMPLE LOCATIONS (SEE SEC. 2-1)

CYANIDE
DESTRUCTION
TANKER (TO4)

waste oil
③

Haz Waste Accumulation Area

ACID TREATMENT
UNIT (TO1)

Acid House

See second
site sketch

Copper Plating

Molybdenum
Disulfide
coating process

PARKING LOT

GATE #1

GATE #2

GATE #4

GATE #3

GATE #5

ROAD

OLSON

- 1 - HEAVY WIRE
- 2 - ACID HOUSE
- 3 - HEAVY WIRE
- 4 - SHIPPING
- 5 - RECEIVING
- 6 - WAREHOUSE (3)
- 7 - FINE WIRE
- 8 - WAREHOUSE (1)
- 9 - WAREHOUSE (2)
- 10 - QUALITY CONTROL

X - X FENCE LINE

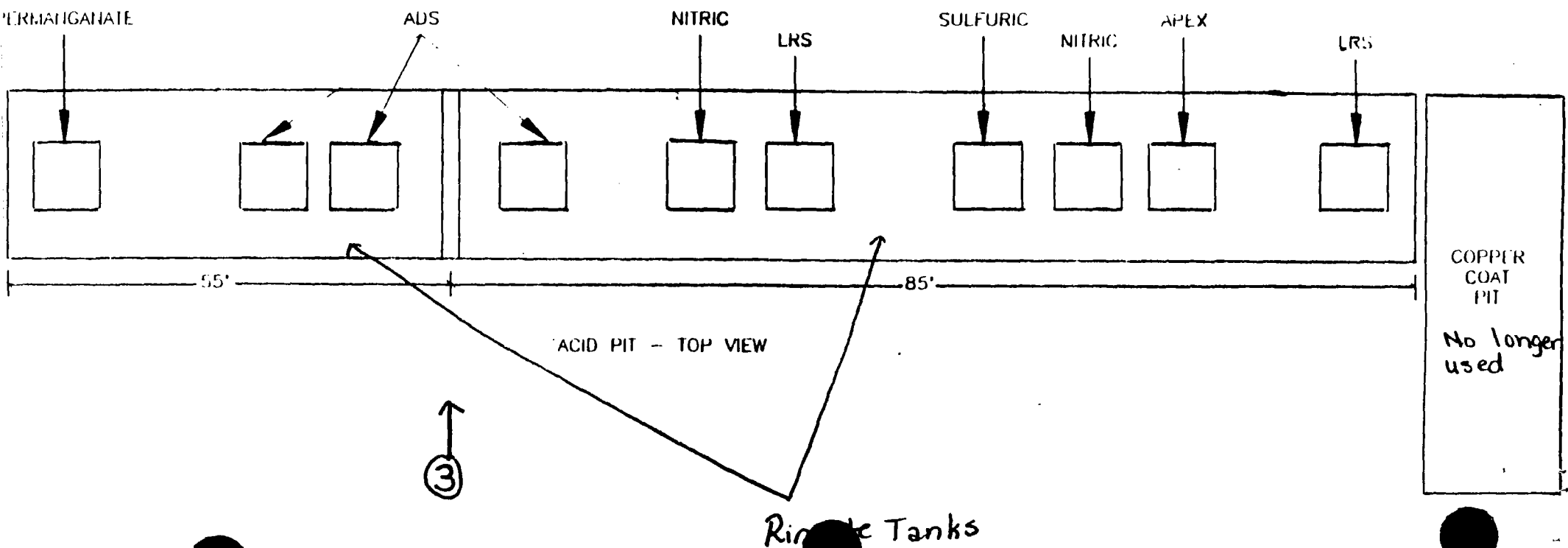


Techalloy Illinois Inc
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JEFFERSON

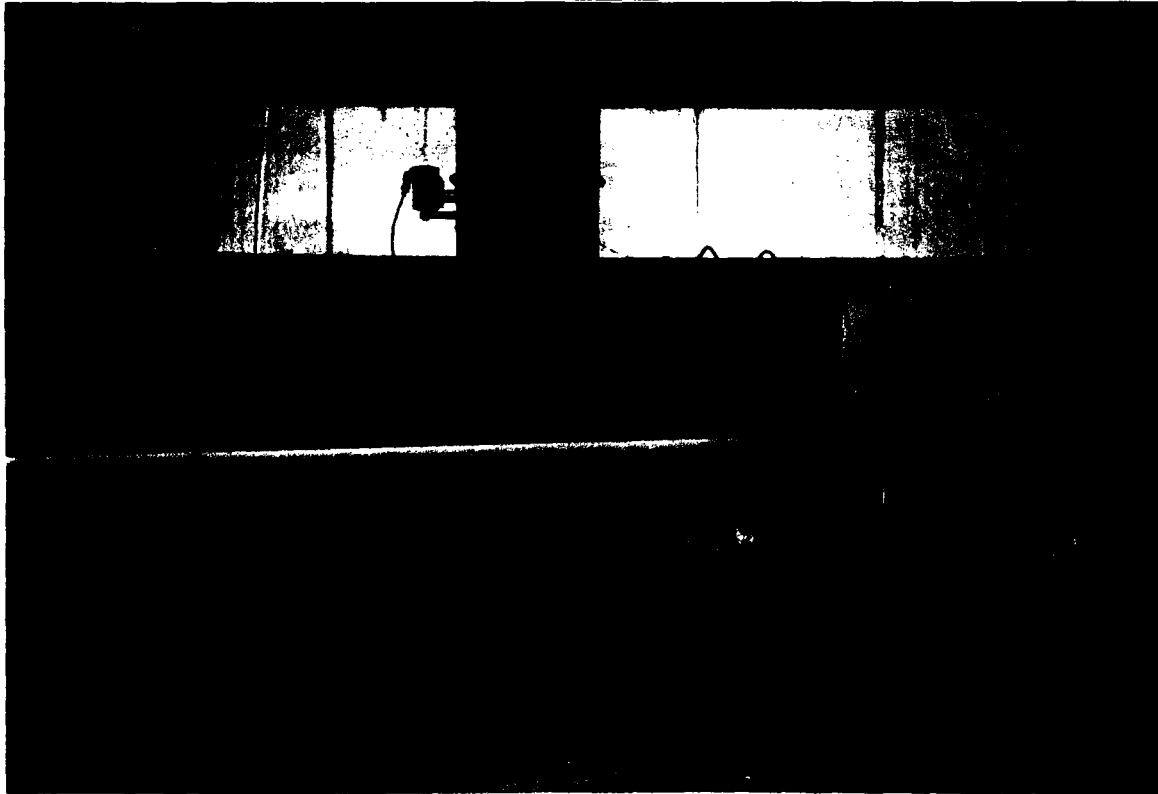
STREET

Acid House Layout

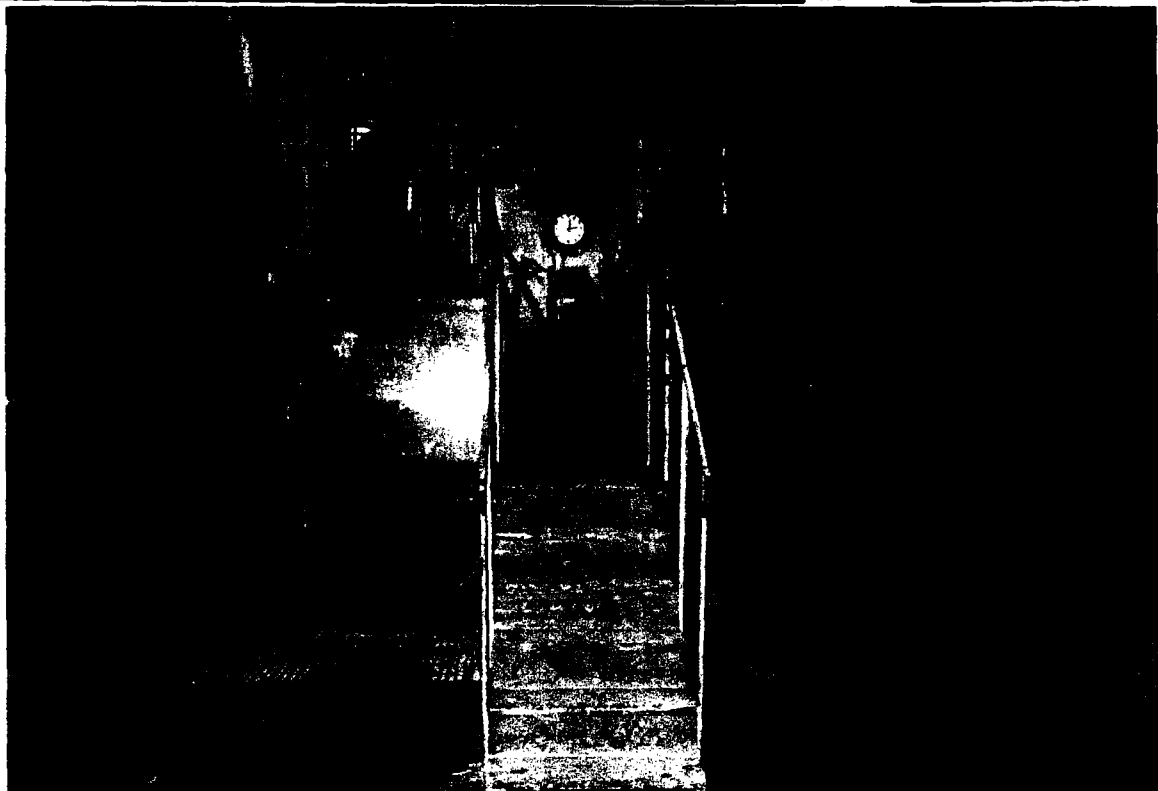


Illinois Environmental Protection Agency Photographs

Name: Techealloy Illinois Inc Site #: 110900003
Date: 1-16-92 Time: 10-12³⁰ Photograph by: Tina Kovasznay



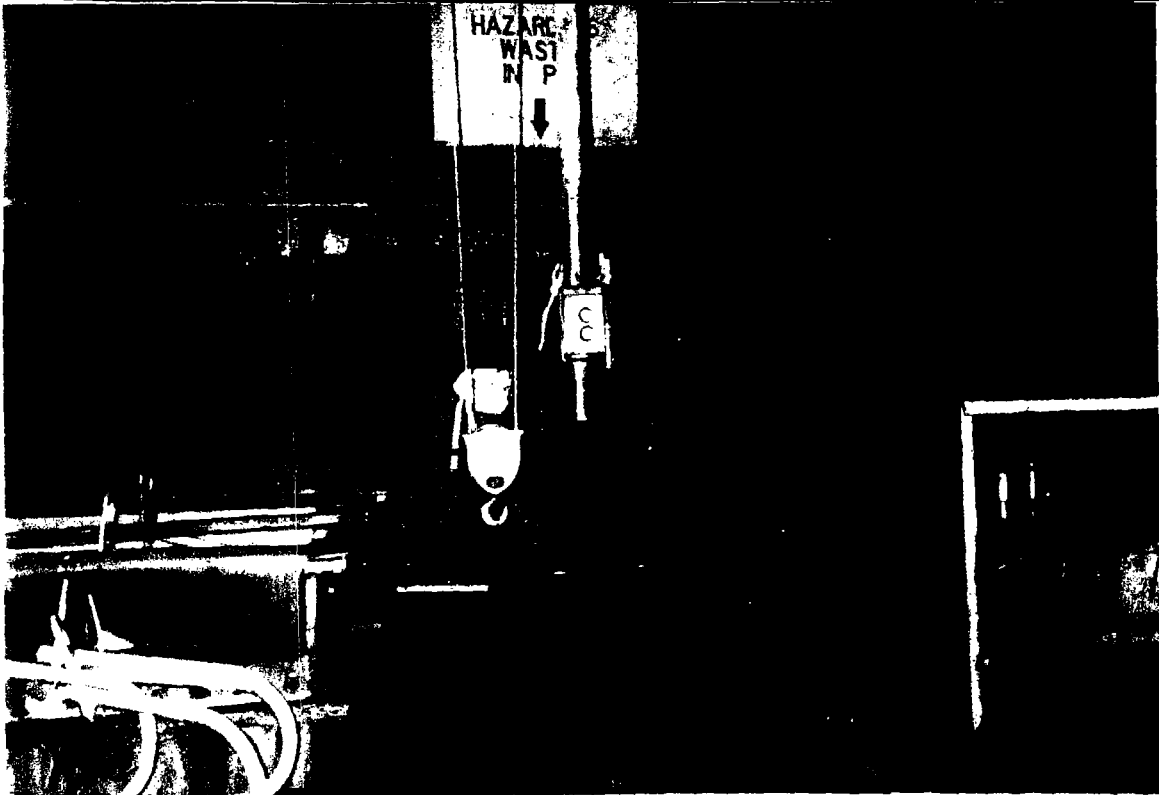
Comments: Molybdenum Disulfide coating process. ↑
Roll #: 92-228 Photo #: 1



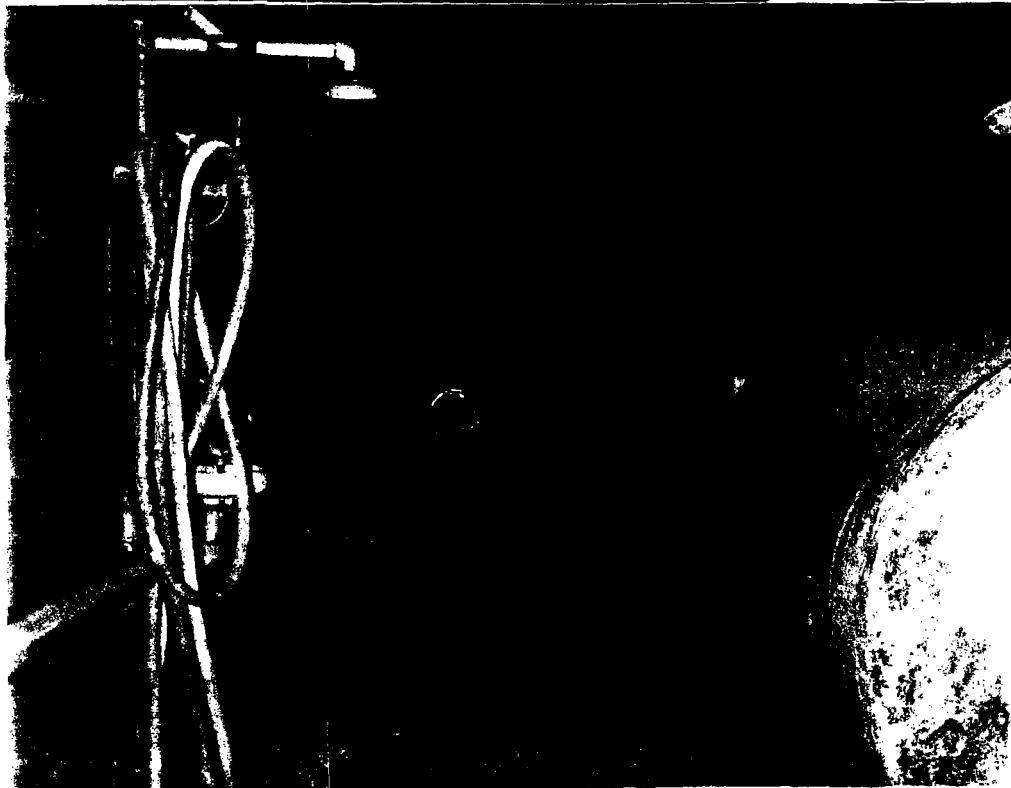
Comments: Copper plating area (New) ↑

Illinois Environmental Protection Agency Photographs

Site Name: Techalloy Illinois Inc Site #: 110900003
Date: 1-16-92 Time: 10-13³⁰ Photographer By: Tina Kovasznay



Comments: Rinse area in acid house ↑
Roll #: 92-228 Photo #: 3



Comments: Acid treatment room (Disassembly tanks) ↑

Illinois Environmental Protection Agency Photographs

Case: Techealloy Illinois Inc Site #: 110901003
Date: 1-16-92 Time: 10-12³⁰ Photograph by: Tina Kovasznay



↑
Caption: Six drums of waste oil

Roll #: 92-228 Photo #: 7

Comments: _____

Illinois Environmental Protection Agency Photographs

Site Name: Teachey Illinois Foc Site #: 110901003
Date: 1-16-92 Time: 10-12³⁰ Photograph By: Tina Kovasznay



Comments: Tanker (T04). No longer in use ↑
N

Roll #: 92-228 Photo #: 5



Comments: Accumulation area. ↑
E

Techalloy
1110900003
1-16-92

REVISION 1 (8/15/88)

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
					Yes	No		
OTH	1			PART 722 GENERATOR STANDARDS Subpart A: General Section 722.111: Hazardous Waste Determination Has the generator determined if the solid waste it generates is a hazardous waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Did the generator follow the procedures specified in this section in making its determination? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
OTH	1			Section 722.112: USEPA Identification Number a Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> c Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facilities that have received a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	2			PART 722 GENERATOR STANDARDS Subpart B: The Manifest Section 722.120: General Requirements	<input checked="" type="checkbox"/>			No such instances
			a	Has the generator who transports, or who offers its hazardous waste for transportation off-site for treatment, storage or disposal prepared a uniform hazardous waste manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				Note: If the generator has not used a manifest, check "No" in the Apparent Compliance Column and skip to 722.130.				
			b	Did the generator designate on the manifest one facility which is permitted to handle the hazardous waste therein described? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				Note: The generator may also designate an alternate facility permitted to handle the hazardous waste in the event an emergency prevents delivery of the hazardous waste to the primary designated facility.				
			d	In any instances where the transporter was unable to deliver the hazardous waste to the designated or alternate permitted facility, has the generator designated another permitted facility or instructed the transporter to return the waste? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>				

Area	Class	90 Day F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>3) Retained one copy as required by Section 722.140(a), Recordkeeping? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) Apparently sent a copy (Part 5 for Illinois manifests) to the Agency within two working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Obtain a copy of any manifest which is not in compliance with the requirements of this subsection. If copies are unobtainable, log manifest #s.</p> <p>b Has the generator apparently given the remaining copies of the manifest to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Has the generator followed the procedures prescribed in Section 722.123(c) for manifesting bulk shipments of hazardous waste by water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>d Has the generator followed the procedures prescribed in Section 722.123(d) for manifesting bulk shipments of hazardous waste by rail? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				no bulk shipments

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		PART 722 GENERATOR STANDARDS Subpart C: Pre-Transport Requirements Section 722.130: Packaging Is waste which is ready for transportation off-site packaged in accordance with 49 CFR, Parts 173, 178 and 179?			✓	None ready for shipment off-site
OTH	1	X		Section 722.131: Labeling Is each package of hazardous waste which is ready for transportation off-site labeled in accordance with 49 CFR Part 172?			✓	
OTH	1	X		Section 722.132: Marking a Is each package of hazardous waste which is ready for transportation off-site marked in accordance with 49 CFR Part 172? Yes ____ No ____			✓	
				b Is each package of hazardous waste which is ready for transportation off-site marked with: - The generator's name and address? Yes ____ No ____ - The manifest document number associated with the container? Yes ____ No ____ - The words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found contact the nearest police, or public safety authority or the U.S. Environmental Protection Agency"? Yes ____ No ____				

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
OTH	1				Section 722.133: Placarding Does the generator have, for the waste it generates, the proper placards to: <ul style="list-style-type: none"> - Placard the transport vehicle, or - Offer to the first transporter, according to 49 CFR, Part 172, Subpart F? NOTE: If the placards are provided by the transporter, then mark the N/A Column and use Comment field to explain.			✓	Provided by transporter
OTH	1	X			Section 722.134: Accumulation Time NOTE: If the TSD checklist will be completed and the facility only accumulates wastes for 90 days or less for Section 722.134 complete page GEN-C-2(a) then skip to TSD checklist. NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area. a For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart 1: Use and Management of Containers listed below: NOTE: If no wastes in containers, mark "N/A" and skip to Section 725.291 of the Generator checklist.	✓			

Area	Class	90 Day F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		Section 722.134: Accumulation Time NOTE: A generator who is also a TSD would be subject to this section for any waste which is not identified for storage on the facility's Part A, or which is being accumulated outside a "permitted" storage area.		<input checked="" type="checkbox"/>		
			a1	For waste in containers, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart I? <p style="text-align: center;">and/or</p> For waste in tanks, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J except Section 725.297(c) and 725.300? Yes ____ No <input checked="" type="checkbox"/>				
			a2	For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes <input checked="" type="checkbox"/> No ____ N/A ____				
			a3	For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes <input checked="" type="checkbox"/> No ____				
			a4	Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subparts C and D, and Section 725.116? Yes <input checked="" type="checkbox"/> No ____				

GEN-C-2(a)

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Condition of Containers (Section 725.271)</p> <p>Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that <u>complies</u> with the requirements of this Part? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Compatibility of Waste with Container (Section 725.272)</p> <p>Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Management of Containers (Section 725.273)</p> <p>Are containers of hazardous waste always closed during storage? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Are containers of hazardous waste being opened, handled or stored in manner which will prevent the rupture of the container or prevent it from leaking? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Inspections (Section 725.274)</p> <p>Is the owner or operator inspecting areas where the containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>NOTE: Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done.</p>				

GEN-C-3

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Special Requirements for Ignitable or Reactive Wastes (Section 725.276)</p> <p>Are containers holding ignitable or reactive waste located at least 50 feet from the property line? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Special Requirements for Incompatible Wastes (Section 725.277)</p> <p>Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				

GEN-C-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>FOR WASTE IN TANKS, has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart J: Tank Systems listed below:</p> <p>NOTE: If the facility has discontinued accumulation of waste in tanks, they are subject to 725.211 and 725.214.</p> <p>NOTE: If no waste in tanks, mark N/A and skip to "For waste in containers ...", Subsection a)2) page GEN-C-14.</p> <p>Assessment of Existing Tank Systems (Section 725.291)</p> <p>For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes ___ No <input checked="" type="checkbox"/></p> <p>NOTE: Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.</p> <p>Does this assessment consider at least the following:</p> <ol style="list-style-type: none"> 1) available standards for the tank and ancillary equipment; 2) hazardous characteristics of the wastes; 3) existing corrosion protection measures; 4) age of the tank system; and 5) results of a leak test, internal inspection, or other tank integrity examination? <p>Yes ___ No ___</p>				No assessment


GEN-C-5

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			a2	<p>For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p>				See TSD checklist
			a3	<p>For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				
			a4	<p>Has the generator complied with the requirements of 35 Ill. Adm. Code 725, Subpart C: Preparedness and Prevention listed below:</p> <p>Maintenance and Operation of Facility (Section 725.131)</p> <p>Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to:</p> <ul style="list-style-type: none"> - Air; - Soil; or - Surface Water, <p>which would threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				


GEN-C-14

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Required Equipment (Section 725.132)</p> <p>Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment:</p> <ul style="list-style-type: none"> - An internal communications or alarm system capable of providing immediate emergency instructions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - A device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police or fire departments or State or local emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - Water at adequate volume and pressure to supply water hose streams or foam producing equipment or automatic sprinklers or water spray systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <p>NOTE: Any "N/A" answers must be explained in the Remarks column.</p>				<p>hand held radios</p> <p>telephones</p> <p>alarm system</p> <p>fire extinguishers, lime, caustic ash, soda soda ash</p>

GEN-C-15


Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
			Sub Sec		Yes	No		
				<p align="center">SATELLITE ACCUMULATION</p> <p>c1 Is the generator who accumulates hazardous waste in containers at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste:</p> <ul style="list-style-type: none"> - Limiting such accumulation to 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133)? Yes _____ No _____ N/A _____ - Complying with the requirements of: <ul style="list-style-type: none"> 1) 35 Ill. Adm. Code 725.271, Condition of Containers? Yes _____ No _____ 2) 35 Ill. Adm. Code 725.272, Compatibility of Waste with Containers? Yes _____ No _____ 3) 35 Ill. Adm. Code 725.273(a), Management of Containers - requiring that the containers be stored closed except when waste is being added or removed? Yes _____ No _____ - Marking the containers with the words "Hazardous Waste" or with words that identify the contents of the containers? Yes _____ No _____ 			✓	<p align="center">No Satellite Accum.</p> 

GEN-C-26


Area	Class	90 Day F U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Ltr Sub Sec		Yes	No		
			c2	<p>Has the generator who accumulates more than 55 gallons (one quart of acutely hazardous waste listed in 35 Ill. Adm. Code 721.133(e)) with respect to the amount of excess waste, complied with the requirements in Section 722.134(a) within three days? Yes ____ No ____</p> <p>Are the containers with the excess amounts marked with the date accumulation began? Yes ____ No ____</p> <p>During the three day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1)? Yes ____ No ____</p>				

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			PART 722 GENERATOR STANDARDS Subpart D: Recordkeeping and Reporting Section 722.140: Recordkeeping Has the generator retained for a period of three years:				none filed no unresolved enforcement no requests.
			a	- A copy of each signed manifest? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	- A copy of each annual report? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	- A copy of each exception report? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
			c	- Copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			d	Does a generator who is involved in any unresolved en- forcement action continue to maintain the records required in 722.140(a) thru (c)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
d	If the Director has requested that the records required in 722.140(a) thru (c) be maintained for a period longer than three years, has the generator continued to maintain them? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>							

GEN-D-1

Area	Class	90 Day F/U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub	Sec		Yes	No		
OTH	2				Section 722.141: Annual Reporting Has the generator who ships waste off-site to a treatment, storage or disposal facility within the United States prepared and submitted a copy of an annual report, as supplied by the Agency, to the Agency by March 1 for the preceeding calendar year? NOTE: A generator who treats, stores or disposes of hazardous waste on-site must also submit an annual report as a TSD in accordance with the requirements of 35 Ill. Adm. Code 702, 703, 724, 725 and 40 CFR 266.	<input checked="" type="checkbox"/>			
MAN	1				Section 722.142: Exception Reporting a Has the generator who has not received a signed copy of the manifest from the designated TSD within 35 days of the date the waste was accepted by the initial transporter determined the status of its hazardous waste? Yes ____ No ____ b Has the generator who has not received a signed copy of the manifest from the designated TSD within 45 days of the date the waste was accepted by the original transporter submitted an exception report to the Director? Yes ____ No ____ b Does any exception report submitted to the Director contain the following: - A legible copy of the manifest for which the generator does not have confirmation of delivery; and			<input checked="" type="checkbox"/>	No exception reports 

GEN-D-2

Area	Class	90 Day F/U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			1tr	Sub Sec		Yes	No		
OTH	1				<p>- A cover letter signed by the generator or his authorized representative explaining the efforts taken to locate the hazardous waste and the results of those efforts? Yes ____ No ____ N/A ____</p> <p>Section 722.143: Additional Reporting</p> <p>Has the generator submitted all additional reports concerning quantities and disposition of wastes as required by the Director?</p>				

GEN-D-3

Tech
1110 0003
1-16-92

Area	Class	90 Day F/U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Ser		Yes	No		
OTH	1			PART 703 RCRA PERMIT PROGRAM Subpart C: Authorization by Rule and Interim Status Section 703.150: Application by Existing HWM Facilities and Interim Status Qualifications a Has the owner or operator of an existing HWM facility or of a HWM facility in existence on the effective date of statutory or regulatory amendments that render the facility subject to the requirement to have a RCRA permit submitted Part A of the permit application to the Agency no later than the following times, whichever comes first: 1) Six months after the date of publication of regulations which first require the owner or operator to comply with standards in 35 Ill. Adm. Code 725? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 2) Thirty days after the date the owner or operator first becomes subject to the standards in 35 Ill. Adm. Code 725? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> 3) By March 27, 1987 for generators who generate more than 100, but less than 1000 kg of waste in a calendar month and treat, store, or dispose of these wastes on-site? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			

PER-C-1

Area	Class	90 Day FU Req	Key Title	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Section		Yes	No		
OTH	1			<p>Section 703.151: Application by New HWM Facilities</p> <p>For a new HWM facility, has the facility complied with the requirements of this section? Specifically, has the facility submitted Part A and Part B of the permit application 180 days before physical construction has commenced? Yes _____ No _____</p> <p>Is the facility only operating with a RCRA permit? Yes _____ No _____</p> <p>NOTE: This violation should be cited in the CIL only after receiving approval from headquarters.</p>			✓	Not a new facility
OTH	1			<p>Section 703.152: Amended Part A Application</p> <p>Has the owner or operator of a HWM facility with interim status filed an amended Part A permit application with the Agency:</p> <p>1) No later than the effective date of revised regulations under 35 Ill. Adm. Code 721, Identification and Listing of Hazardous Waste, listing or identifying additional hazardous waste which the HWM facility is handling? Yes _____ No _____ N/A ✓</p> <p>2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status? Yes ✓ No _____ N/A _____</p> <p>NOTE: The owner or operator of a facility who fails to comply with the updating requirements of this section does not receive interim status as to the wastes not covered by duly filed Part A applications.</p>	✓			

Area	Class	90 Day F.U. Req	Key	Requirement	In Apparent Compliance		Not Applicable	Remarks and Comment No.
			Sub Sec		Yes	No		
OTH	1			Section 703.154: Prohibitions During Interim Status During interim status, has the facility refrained from: <ul style="list-style-type: none"> a - Treating, storing or disposing of hazardous waste not specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b - Employing processes not specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> c - Exceeding the design capacities specified in Part A of the permit application? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 	<input checked="" type="checkbox"/>			
OTH	1			Section 703.155: Changes During Interim Status NOTE: Section 703.155(a), (b) and (c) reiterate in more detail the requirement that a HWM facility submit and, in the case of (b) and (c) that the Agency approve, amendments to the Part A permit application prior to the facility conducting the activity or receiving new hazardous waste. A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this section. <ul style="list-style-type: none"> d Did the owner or operator submit a revised Part A permit application not later than 90 days prior to changes in operational control or ownership of the HWM facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	<input checked="" type="checkbox"/>			

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks / Comment No
			Sub Sec		Yes	No		
OTH	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart A: General Provisions				
			d	Section 725.101: Purpose, Scope and Applicability Does the facility qualify for any of the exemptions under Section 725.101(c)? Yes _____ No <input checked="" type="checkbox"/> NOTE: If "Yes", explain in narrative. Has the firm managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of 725.101(d)? Yes _____ No <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			

Area	Class	90 Day F U Req	Key Etc Sub Sec	Requirement	In Apparent Compliance		Not Applicable	Remarks or Comment No
					Yes	No		
				PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart B: General Facility Standards				
OTH	1			Section 725.111: USEPA Identification Number Has the facility obtained a USEPA identification number?	<input checked="" type="checkbox"/>			
OTH	1			Section 725.112: Required Notices a Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			no wastes from foreign sources
				b Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period, did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 703, 703 and 725? Yes <input checked="" type="checkbox"/> No _____ N/A _____				
OTH	1			Section 725.113: General Waste Analysis a1 Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes <input checked="" type="checkbox"/> No _____	<input checked="" type="checkbox"/>			

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			a1	Does the analysis contain all the information which must be known to treat, store or dispose of the waste in accordance with this Part? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				no changes in process not an off-site facility ↓
			a3	Has the analysis been repeated: A) When the operator is notified or has reason to believe that the process generating the hazardous waste has changed? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> B) By off-site facilities, when the results of the inspection required in Section 725.113(a)(4) indicate that the hazardous waste received at the facility does not match the waste designated on the accompanying manifest or shipping paper? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
			a4	Has the owner or operator of an off-site facility apparently inspected each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
			b	Has the owner or operator developed a written analysis plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				NOTE: If "No", skip to 725.114. Is the written waste analysis plan available at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-B-2

Area	Class	90 Day F U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			1 tr		Sub Sec	Yes		
				<p>Does the owner or operator follow the procedures in the written plan so as to comply with the requirements in Section 725.113(a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>b Does the plan specify:</p> <p>1) The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>2) The test methods which will be used to test for those parameters? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>3) The sampling method which will be used to obtain a representative sample of the waste to be analyzed? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>4) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				

not an off site
facility

TSD-B-3

Area	Class	90 Day T U Req	Key		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			1 tr	Sub Ser		Yes	No		
					<p>6) The methods which will be used to meet the additional analysis requirements for specific waste management methods as specified in Sections:</p> <ul style="list-style-type: none"> - 725.293 <u>(Tanks)</u> - 725.325 (Surface Impoundments); - 725.352 (Waste Piles); - 725.373 (Land Treatment); - 725.414 (Incinerators); - 725.475 (Thermal Treatment); - 725.502 (Chem. Phys. Bio. Treat.) <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Circle the specific waste management methods being employed.</p> <p>c For off-site facilities, does the plan:</p> <p>1) Describe the procedures which will be used to determine the identity of each movement of waste managed at the facility? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>2) Describe the sampling methods which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p> <p>Section 725.114: Security</p> <p>Does the facility qualify for the exemption to the requirement to provide security provided in Section 725.114(a)? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p>				
OTH	1	X				<input checked="" type="checkbox"/>			not an off site facility

TSD-B-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks, or Comment No
			Sub Sec		Yes	No		
				<p>Does a non-exempt facility have either:</p> <p>b 1) A 24-hour surveillance system which continuously monitors and controls entry into the active portion of the facility? Yes _____ No <input checked="" type="checkbox"/></p> <p style="text-align: center;">OR</p> <p>b 2) An artificial or natural barrier which completely surrounds the active portion of the facility and a means to control entry at all times thru the gate(s) or other entries to the active portion of the facility? Yes <input checked="" type="checkbox"/> No _____</p> <p>c Does a non-exempt facility have a sign, legible from a distance of at least 25 feet, with the words "Danger - Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations in sufficient numbers to be seen from any approach to the active portion? Yes <input checked="" type="checkbox"/> No _____</p> <p>NOTE: Existing signs with legends other than the one above may be used if the legend on the sign indicates only authorized personnel are allowed to enter the active portion and that entry onto the active portion can be dangerous.</p>				

TSD-B-5

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			Section 725.115: General Inspection Requirements		<input checked="" type="checkbox"/>		
			a	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors and discharges which are causing or may lead to:				
				1) Release of hazardous waste or hazardous waste constituents to the environment; or a threat to human health? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			a	Does the owner or operator conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b1	Has the owner or operator developed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment important to preventing, detecting or responding to environmental or human health hazards? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b2	Is the written schedule at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b3	Does the schedule identify the types of problems which are to be looked for during the inspection? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
b4	Does the schedule specify at least the following minimum inspection frequency:							
				- Daily inspections of areas subject to spills? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

Area	Class	90 Day F U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>- The items and frequencies, where applicable, called for in Sections:</p> <ul style="list-style-type: none"> - 725.274 (Containers); - 725.294 (<u>Tanks</u>); - 725.326 (Surface Impoundments); - 725.447 (Incinerators); - 725.477 (Thermal Treatment); - 725.503 (Chem. Phys. Bio. Treat.) <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>NOTE: Circle the applicable section.</p> <p>c Has the owner or operator remedied any deterioration or malfunction of equipment or structures which the inspections reveal on a schedule which ensures that the problem does not lead to an environmental or human health hazard? Yes <input checked="" type="checkbox"/> No _____</p> <p>c Where a hazard is imminent or has already occurred, has the owner or operator taken immediate action to resolve the problem? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>d Does the owner or operator record the results of inspections in a log or summary? Yes _____ No <input checked="" type="checkbox"/></p> <p>d Does the inspection record include:</p> <ul style="list-style-type: none"> - The date and time of the inspection? Yes _____ No _____ - The name of the inspector? Yes _____ No _____ 				<p>freq of tank inspections is not documented</p> <p>no such hazards</p> <p>(No longer inspect T01/T04)</p> <p>results of inspection are not recorded</p> <p>↓</p>

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			<ul style="list-style-type: none"> - A notation of the observations made? Yes ____ No ____ - The date and nature of any type of corrective action? Yes ____ No ____ N/A ____ <p>Section 725.116: Personnel Training</p> <p>Does the facility have a training program? Yes <input checked="" type="checkbox"/> No ____</p> <p>NOTE: If "No", skip to Section 725.117, Page TSD-B-10.</p> <p>a1 Have facility personnel who are involved with hazardous waste management successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes <input checked="" type="checkbox"/> No ____</p> <p>Is the training program formalized, i.e., written down? Yes <input checked="" type="checkbox"/> No ____</p> <p>a2 Is the program directed by a person who has been trained in hazardous waste management procedures? Yes <input checked="" type="checkbox"/> No ____</p> <p>a3 Does the program cover, at a minimum:</p> <p>A) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input checked="" type="checkbox"/> No ____ N/A ____</p>	<input checked="" type="checkbox"/>			↓

TSD-B-8

Area	Class	90 Day F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>B) Key parameters for automatic waste feed cutoff systems? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>C) Communications or alarm systems? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>D) Response to fire or explosion? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>E) Response to ground water contamination incidents? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Does the program cover the implementation of the contingency plan? Yes <input checked="" type="checkbox"/> No _____</p> <p>b Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>c Has the facility conducted an annual review of the initial training? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>d Are the following documents and records being maintained at the facility:</p> <p>1) The job title for each position related to the management of hazardous waste and the name(s) of the employee(s) filling each job? Yes <input checked="" type="checkbox"/> No _____</p>				

TSD-B-9

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous waste management? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			e	Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
				Section 725.117: General Requirements for Ignitable, Reactive or Incompatible Wastes				
			a	Are ignitable and reactive wastes protected from and separated from sources of ignition and reaction? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			a	Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

Area	Class	90 Day F U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
			a	Are "No Smoking" signs posted whenever there is a hazard from ignitable or reactive waste? Yes ____ No ____ <i>N/A</i> ✓				<i>No such hazards</i>
			b	Is the treatment, storage or disposal of ignitable or reactive waste and the mixture or comingling of incompatible wastes and materials being done so that it does not: <ul style="list-style-type: none"> 1) Generate extreme heat or pressure, fire, or explosion or violent reaction? Yes <input checked="" type="checkbox"/> No ____ 2) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health? Yes <input checked="" type="checkbox"/> No ____ 3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? Yes <input checked="" type="checkbox"/> No ____ 4) Damage the structural integrity of the device or facility containing the waste? Yes <input checked="" type="checkbox"/> No ____ 5) Through other like means threaten human health or the environment? Yes <input checked="" type="checkbox"/> No ____ 				

TSD-B-11

Area	Class	90 Day F/U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>Section 725.118: Location Standards</p> <p>Has the facility placed hazardous waste in a salt dome, salt bed formation, underground mine or cave after July 11, 1986?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>NOTE: A "Yes" answer is a violation of the location standard.</p>			<input checked="" type="checkbox"/>	

TSD-B-12

Area	Class	90 Day F U Req	Key Ltr		Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec	Yes		No			
OTH	1	X			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart C: Preparedness and Prevention Section 725.131: Maintenance and Operation of Facility Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to: <ul style="list-style-type: none"> - Air; - Soil; or - Surface water, which would threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>		
OTH	1	X			Section 725.132: Required Equipment Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment: <ul style="list-style-type: none"> a - An internal communications or alarm system capable of providing immediate emergency instructions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b - A device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police or fire departments or State or local emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	<input checked="" type="checkbox"/>	<input type="checkbox"/>		hand held radios telephones alarm system

TSD-C-1

Area	Class	90 Day F U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X	c	- Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>			fire extinguishers, lime, caustic ash, soda ash
			d	- Water at adequate volume and pressure to supply water hose streams or foam producing equipment or automatic sprinklers or water spray systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
				NOTE: Any "N/A" answers must be explained in the Remarks column. Section 725.133: Testing and Maintenance of Equipment Where required, is the facility testing and maintaining, as necessary, to assure proper operation in time of emergency:				
				- Communications/alarm systems? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
				- Fire protection equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
				- Spill control equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
				- Decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
				NOTE: Any "N/A" answer must be explained in the Comments.				

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		Section 725.134: Access to Communications or Alarm Systems a Do all personnel involved in handling hazardous waste have immediate access to an internal alarm or emergency communication device, either directly or thru visual or voice contact with another employee, unless not required under Section 725.132? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b If there is ever just one employee on the premises while the facility is operating, does he have immediate access to a device, such as a telephone, capable of summoning external emergency assistance, unless such a device is not required under Section 725.132? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>			never one employee
OTH	1	X		Section 725.135: Required Aisle Space Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility?	<input checked="" type="checkbox"/>			
OTH	2			Section 725.137: Arrangements with Local Authorities a Has the owner or operator made or attempted to make the following arrangements as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:	<input checked="" type="checkbox"/>			

TSD-C-3

Area	Class	90 Day F U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>1) Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>2) Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the primary emergency authority? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>NOTE: Any "N/A" answer must be explained in the Comments.</p> <p>b Has the owner or operator documented, in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/></p>				<p>Union Fire Dept. Marengo Rescue Squad</p> <p>McHenry Co Sheriff State Police (Elgin)</p> <p>Memorial Hosp. (Woodstock)</p> <p>St. Joseph Hosp. (Belvidere)</p> <p>No refusals</p>

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart D: Contingency Plan and Emergency Procedures Section 725.151: Purpose and Implementation of Con- tingency Plan a Is a plan available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NOTE: If the answer is "No", skip to 725.155. a Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazard- ous waste constituents to air, soil, or surface waters? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> b Have the provisions of the plan been carried out immedi- ately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> Section 725.152: Content of Contingency Plan a Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to: 1) Fires? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> 2) Explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			never implemented
OTH	2				<input checked="" type="checkbox"/>			


Area	Class	90 Day F/U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil, or surface water? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>c Does the plan describe the arrangements agreed to by:</p> <p>1) Local police and fire departments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>2) Hospitals? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>3) Contractors? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p> <p>4) State and local emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d Does the plan list the names, addresses and phone numbers (office and home) of all personnel qualified to act as emergency coordinators? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d Is the list of emergency coordinators up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>d If more than one person is designated as an emergency coordinator is a primary coordinator designated? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>e Does the plan identify:</p> <p>1) A list and physical description of all emergency equipment at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>				

Area	Class	90 Day F/U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			2) A brief outline of the capability of each piece of emergency equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	<input checked="" type="checkbox"/>			
				3) The location of each piece of emergency equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			e	Is the list of emergency equipment up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			f	Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
			f	Does the plan identify the signal to be used to begin evacuation? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			f	Are alternate evacuation routes identified? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				Section 725.153: Copies of Contingency Plan				
			a	Has a copy (and all revisions) of the contingency plan:				
				a) Been maintained at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
				b) Been submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

TSD-D-3

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1/2			<p>Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Does the coordinator have the authority to commit the resources to carry out the contingency plan?</p> <p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p> <p>Section 725.156: Emergency Procedures</p> <p>Has the facility had a release, fire or explosion?</p> <p>Yes <input type="checkbox"/> No <input checked="" type="checkbox"/></p> <p>NOTE: If the answer is "Yes", explain in detail the incident and how the facility did or did not follow the procedures described in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column.</p>	<input checked="" type="checkbox"/>			

TSD-D-5

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart E: Manifest System, Recordkeeping and Reporting Section 725.171: Use of Manifest System Does the facility accept waste from off-site? Yes _____ No <input checked="" type="checkbox"/> NOTE: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" and skip to 725.173. For each manifest reviewed, did the facility:				✓ No waste from off-site 
			a1	1) Sign and date each copy to certify that the hazardous waste covered by the manifest was received? Yes _____ No _____				
			a2	2) Note any significant discrepancies in the manifest or each copy of the manifest? Yes _____ No _____ N/A _____				
			a3	3) Immediately give one copy of the completed manifest to the transporter? Yes _____ No _____				
			a4	4) Within 30 days after delivery, send one copy of the manifest to the generator and one copy to the Agency? Yes _____ No _____				
			a5	5) Retain a copy of the manifest at the facility for a period of three years from the date of delivery of the waste? Yes _____ No _____				

Area	Class	90 Day F U Req	Key	Requirement	In Apparent Compliance		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
MAN	2		b	<p>Has the facility followed the procedures prescribed in 725.171(b) for rail or water (bulk shipments) of hazardous waste? Yes _____ No _____ N/A _____</p> <p>Does the facility initiate shipments of hazardous waste? Yes _____ No _____</p> <p>NOTE: If the answer is "Yes", the facility is also a generator of hazardous waste. Complete the generator checklist.</p> <p>Section 725.172: Manifest Discrepancies</p> <p>NOTE: If there are no manifest discrepancies, mark the "N/A" column.</p>				
			b	<p>Has the owner or operator attempted to resolve significant discrepancies in quantity or type (i.e., variations in weight of 10% or more, variations in piece count of one container per truckload, obvious differences which can be discovered by inspection or waste analysis such as waste solvent substituted for waste acid) upon their discovery? Yes _____ No _____</p> <p>d If the discrepancy is not resolved within 15 days after receiving the waste, has the owner or operator submitted to the Agency a letter describing the discrepancy and the attempts made to reconcile it and a copy of the manifest or shipping paper at issue? Yes _____ No _____</p>				

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	2			Section 725.173: Operating Record			<input checked="" type="checkbox"/>	
			a	Does the owner or operator have a written operating record at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	Is the information in the operating record being maintained until closure of the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			b	Does the operating record contain the following information:				
			1)	A description of and quantity of each hazardous waste received at the TSD facility (whether from on or off-site generation)? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
			2)	A record of the method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			3)	The location of each hazardous waste within the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				
			4)	The quantity of each hazardous waste at each location within the facility? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>				
			5)	For disposal facilities, a map recording the location and quantity of hazardous waste in each cell or disposal area? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				

no way to accurately measure quantity. (quantity cannot be measured at the time of generation)

quantity of waste in tank is not being documented in op. record
Not a disposal facility

TSD-E-3


Area	Class	90 Day Fill Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>6) A cross reference by manifest number to location and quantity of hazardous waste? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>7) Records and results of waste analyses and trial test performed as specified in Sections:</p> <p>- 725.113 (Gen. Waste Analysis)? Yes <input checked="" type="checkbox"/> No _____</p> <p>- 725.293 (Tanks)? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>- 725.325 (Surface Improvements)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>- 725.352 (Waste Piles)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>- 725.373 (Land Treatment)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>- 725.441 (Incinerators)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>- 725.475 (Thermal Treatment)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>- 725.502 (Chem., Phys., Bio. Treatment)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>8) Summary reports and details of all incidents that require the implementation of the contingency plan as specified in Section 725.156(j)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>				<p>no such units</p> <p>↓</p> <p>never implemented</p>

TSD-E-4

Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>9) Records and results of inspections as required by Section 725.115(d)? Yes _____ No <input checked="" type="checkbox"/></p> <p>NOTE: The above information on inspection records need only be kept for three years. This period would automatically be extended during any unresolved enforcement action.</p> <p>10) Monitoring, testing or analytical data where required by Sections:</p> <ul style="list-style-type: none"> - 725.190 (G.W. Monitoring)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> - 725.194 (G.W. Monitoring)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> - 725.376 (Land Treatment)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> - 725.378 (Land Treatment)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> - 735.380(d)(1) (Land Treatment)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> - 725.447 (Incinerators)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> - 725.477 (Thermal Treatment)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> <p>NOTE: Data required under 725.194 must be kept throughout the post-closure period.</p>				


Area	Class	90 Day F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No.
					Yes	No		
OTH	2			11) All closure cost estimates required by Section 725.242? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	<input checked="" type="checkbox"/>			
				12) All post-closure cost estimates for disposal facilities required for Section 725.244? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				
				Section 725.174: Availability, Retention and Disposition of Records				
				a During the inspection, were all records including plans required under this Part furnished upon request and made available at all reasonable times for inspection as required by this Section? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>				
				c Upon closure of a waste disposal facility did the owner or operator submit a copy of the record of waste disposal location(s) and quantities to: N/A				<i>not a disposal facility</i>
			- The Agency? Yes <input type="checkbox"/> No <input type="checkbox"/>					
			- The local land authority? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>					
				b Are all required records being maintained and retained during the course of any unresolved enforcement action or as requested by the Director? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>				<i>no unresolved enforcement</i>

TSD-E-6

Area	Class	90 Day Full Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No		
			Sub Sec		Yes	No				
OTH	2			<p>Did the owner or operator submit the unmanifested waste report to the Agency within 15 days of receiving the waste?</p> <p>Yes _____ No _____</p>						
				<p>Section 725.177: Additional Reports</p> <p>Has the owner or operator submitted to the Agency, as required, reports concerning:</p>						
			a	<p>1) Releases, fires, explosions as specified in Section 725.156?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>						
			b	<p>2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>						
			c	<p>3) Facility closure as specified in Section 725.215?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>						


Area	Class	90 Day F-U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
CLO	1			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subparts G and H: Closure, Post-Closure and Financial Requirements				
			a	Section 725.212: Closure Plan Was the most current facility closure plan available during the inspection? Yes ____ No <u>✓</u> Was the closure plan submitted to the Agency within the time frames specified below: - At least 180 days prior to the date closure of the first surface impoundment, waste pile, land treatment or landfill unit was (is) expected to begin? Yes ____ No ____ N/A <u>✓</u> - At least 180 days prior to the date of final closure of a facility with surface impoundment(s), waste pile(s), land treatment or landfill unit(s)? Yes ____ No ____ N/A <u>✓</u> - At least 45 days prior to the date of final closure of a facility with any tank(s), container storage or incinerator unit(s)? Yes ____ No ____ N/A <u>✓</u> - At least 60 days prior to the date closure is expected to begin at a facility with a surface impoundment, waste pile, landfill or land treatment unit which also has an approved closure plan? Yes ____ No ____ N/A <u>✓</u>		<u>✓</u>		

Area	Class	90 Day F U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
CLO	1			<ul style="list-style-type: none"> - No later than 15 days after termination of interim status (unless a full operating permit was issued simultaneously)? Yes _____ No _____ N/A <input checked="" type="checkbox"/> - No later than 15 days after issuance of a judicial decree or Board Order to cease receiving hazardous waste or close? Yes _____ No _____ N/A <input checked="" type="checkbox"/> 				none needed
			a	Section 725.218: Post-Closure Plan Was the most current facility post-closure plan available during the inspection? Yes _____ No _____ Was the post-closure plan submitted to the Agency within the time frames established in this sub-section? Yes _____ No _____ N/A _____				
				Section 725.242: Cost Estimate for Closure Has the facility prepared a written estimate of the cost of closing the facility?	<input checked="" type="checkbox"/>			
FIN	1			Section 725.244: Cost Estimate for Post-Closure Care Has the facility prepared a written estimate of the annual cost of post-closure monitoring and maintenance of the facility?	<input checked="" type="checkbox"/>			
FIN	1			NOTE: If no post-closure plan, mark "N/A".				

Area	Class	Gen D.U. F.U. Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
					Yes	No		
OTH	2			PART 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart J: Tank Systems Section 725.290: Applicability Does the facility store or treat hazardous waste in tanks? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> If "No", skip Subpart J. NOTE: Tanks or sump pits that serve as part of a secondary containment system to collect or contain releases are not subject to Subpart J requirements. Will the waste stored in the tanks fail the filter test and are the tanks located inside a building with an impermeable floor? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NOTE: Failing the filter test means that the waste contains free liquids. Section 725.291: Assessment of Existing Tank Systems				
				a For tanks not protected by a secondary containment system, is an independent, certified written assessment available? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NOTE: Except as provided in Subsection (c) of 725.291, certified assessment must be available by 1/12/88.				No assessment on SO2 

Area	Class	90 Day F.U. Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTII	1		b	<p>Does this assessment consider at least the following:</p> <ol style="list-style-type: none"> 1) available standards for the tank and ancillary equipment; 2) hazardous characteristics of the wastes; 3) existing corrosion protection measures; 4) age of the tank system; and 5) results of a leak test, internal inspection, or other tank integrity examination? Yes _____ No _____ <p>Section 725.292: Design and Installation of New Tank Systems or Components</p>				<p>↓</p> <p>✓ No new tanks</p> <p>↓</p>
			a	<p>For new tanks (built after July 14, 1986) was an independent, certified written assessment prepared? Yes _____ No _____</p> <p>Does the assessment include, at a minimum, the following:</p> <ol style="list-style-type: none"> 1) design standards for tanks and ancillary equipment; <p>NOTE: These standards should include protection from damage from vehicular traffic, adequate foundations, anchoring to prevent flotation or dislodgement, and withstanding the effects of frost heave.</p> <ol style="list-style-type: none"> 2) hazardous characteristics of the waste; and 3) evaluation of potential for corrosion and corrosion protection measures? Yes _____ No _____ 				

Area	Class	90 Day F/U Req	Key	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH			g	Has the owner obtained and kept on file at the facility the certifications of the design and installation requirements of Subsections (b) through (f)? Yes _____ No _____				<p>↓</p> <p>not a new tank</p> <p>these wastes aren't stored</p> <p>No secondary containment</p> <p>↓</p>
				Section 725.293: Containment and Detection of Releases		✓		
	a1			Is secondary containment provided for any new tank system (constructed after 7/14/86) before being put into service? Yes _____ No _____ N/A ✓				
	a2			Does an existing tank, which stores F020, F021, F022, F023, F026 or F027 waste(s) have secondary containment (secondary containment is required by January 12, 1989)? Yes _____ No _____ N/A ✓				
	a3			For an existing tank, of known age, which stores any hazardous waste, is secondary containment provided (secondary containment is required by January 12, 1989 or when the tank is 15 years old, whichever is later)? Yes _____ No _____ N/A ✓				
	a4			For an existing tank of unknown age, has secondary containment been provided by January 12, 1995? Yes _____ No _____ N/A ✓				
			or					
				If the facility is older than 7 years, by the time the facility reaches 15 years of age or January 12, 1989, whichever is later? Yes _____ No ✓ N/A _____				
			a5	For tanks that store wastes that are listed as hazardous after 1/12/87, has secondary containment been provided on the same basis as required in Subsections (a)(1) through (a)(4) of 725.293 substituting the date that a material becomes a hazardous waste for 1/12/87? Yes _____ No _____ N/A ✓				


Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Ser		Yes	No		
			b1&2	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes out of the system, and capable of detecting and collecting releases? Yes _____ No _____ N/A _____</p> <p>NOTE: To meet the requirements of Subsection (b) secondary containment must comply with the physical requirements given in Subsection (c)(1) through (4) (compatible liner, foundation, leak detection system).</p>				
			c4	<p>Is spilled or leaked wastes and accumulated precipitation removed from the secondary containment within 24 hours? Yes _____ No _____ N/A _____</p> <p>NOTE: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>				
			d	<p>Does the secondary containment have one or more of the following:</p> <ol style="list-style-type: none"> 1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? <p>Yes _____ No _____ N/A _____</p> <p>NOTE: Liners, vaults or double-walled tanks must also comply with the requirements of Section 725.293, Subsection (e) or "No" should be marked and explained in the comment.</p>				
			f	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsections (h) and (c) except for:</p>				


Area	Class	90 Day F/U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>1) above ground piping (exclusive of flanges, joints, valves and connections) that are inspected daily;</p> <p>2) welded flanges, joints and connections that are inspected daily;</p> <p>3) sealless or magnetic coupling pumps that are inspected daily; and</p> <p>4) pressurized above ground piping systems with automatic shut-off devices that are inspected daily? Yes _____ No _____ N/A _____</p> <p>i Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p> <p>1) For non-enterable underground tanks, has a yearly leak test that meets the requirements of 725.291(b) been conducted? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>2) For enterable underground tanks and ancillary equipment, has a yearly leak test or an internal inspection or other tank integrity examination by an independent registered professional engineer been conducted? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (2)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>				<p>↓</p> <p>not an underground tank</p>

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1	X		Section 725.294: General Operating Requirements	<input checked="" type="checkbox"/>			not needed
			b1&2	Are tanks equipped with spill prevention controls (e.g., check valves, dry disconnect couplings) and overfill prevention controls (e.g., level sensing devices, high level alarms, automatic feed cutoff or bypass to a standby tank)? Yes ____ No ____ N/A ✓				
			b3	Is a sufficient freeboard being maintained in uncovered tanks to prevent overtopping by wave or wind action or by precipitation? Yes <input checked="" type="checkbox"/> No ____ N/A ____				
OTH	2		c	If a leak or spill has occurred in the tank system, has the owner or operator complied with the requirements of 725.296? Yes ____ No ____ N/A ✓				no leaks
				Section 725.295: Inspections	<input checked="" type="checkbox"/>			
OTH	1	X		Section 725.296: Response to Leaks or Spills and Disposition of Tank Systems	<input checked="" type="checkbox"/>			inspections are not documented
				Does the facility have a tank system or secondary containment system from which there has been a leak or spill, or which is unfit for use? Yes ____ No <input checked="" type="checkbox"/>				
				NOTE: If "No", skip to Section 725.297. If "Yes", answer the following questions. If there is a violation of the requirements in this section, there is also a violation of Section 725.294(c).				no leak or spill ↓

Area	Class	Do Day E U Reg	Key	Requirement	In Apparent Compliance		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
				<p>If a tank or secondary containment system has leaked, has the owner done the following:</p> <p>a 1) Ceased using, stopped inflow of wastes? Yes _____ No _____</p> <p>b 2) Removed the waste from the tank system within 24 hours and/or from the secondary containment system within 24 hours? Yes _____ No _____</p> <p>3) Taken actions to prevent waste migration and removed and properly disposed of visibly contaminated soil or subsurface water? Yes _____ No _____</p> <p>d 4) Reported to the Agency within 24 hours of detection? Yes _____ No _____</p> <p><u>NOTE: Reporting to the Agency is <u>not</u> necessary if less than one pound of material which was <u>immediately</u> contained and cleaned up was spilled.</u></p> <p>5) Within 30 days of detection of a release, submitted a report to the Agency that complies with Section 725.296(d)(3)(A) through (E)? Yes _____ No _____</p> <p>e4 If the source of the release was from a component of a tank system without secondary containment, has the owner provided secondary containment (that satisfies 725.293) to the component of the system before it is returned to service? Yes _____ No _____ N/A _____</p> <p><u>NOTE: If the component is above ground and can be visually inspected then secondary containment is not needed.</u></p>				

Area	Class	90 Day F.U. Req	Key Lit	Sub Sec	Requirement	In Apparent Compliance		Not Applicable	Remarks or Comment No		
						Yes	No				
CLO	1		f		<p>Certification of major repairs. If an extensive repair has been done, then is a certification by an independent, registered professional engineer, that the repaired system is capable of handling hazardous waste available before the tank is returned to service?</p> <p>Yes _____ No _____ N/A _____</p> <p>Has the certification been submitted within 7 days after returning the tank system to use?</p> <p>Yes _____ No _____ N/A _____</p>				<p>↓</p> <p>No closure occurring at the time of the inspection (closure is planned for the near future)</p> <p>↓</p>		
					<p>Section 725.297: Closure and Post Closure Care</p> <p>NOTE: The requirements of this section apply to closure of tank systems. If no closure is being performed, then skip to Section 725.298.</p>						
				a	<p>At the time of closure, has the owner removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste (unless 721.103(d) applies)?</p> <p>Yes _____ No _____</p>						
				a	<p>Has the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H?</p> <p>Yes _____ No _____</p>						
			b		<p>If contaminated soils are <u>not</u> removed, then has the tank system performed closure and post closure care in accordance with requirements applicable to landfills (Section 725.410)?</p> <p>Yes _____ No _____</p> <p>NOTE: Such a tank system is considered a "Landfill" and shall meet all of the requirements of landfills specified in Subparts G and H.</p>						

Area	Class	90 Day F U Req	Key Ltr	Requirement	In Apparent Compliance?		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
OTH	1			Section 725.298: Special Requirements for Ignitable or Reactive Wastes Are ignitable or reactive wastes stored in tanks? Yes ____ No <input checked="" type="checkbox"/> NOTE: If "No", skip to Section 725.299. a If ignitable or reactive wastes are stored or treated in tanks, then is it in such a way that the waste is protected from material or conditions that may cause it to ignite or react? Yes ____ No ____ NOTE: Tank systems used <u>solely</u> for emergencies may store ignitable/reactive wastes. b Are there proper protective distances between the waste management area and the facility boundary line? Yes ____ No ____			<input checked="" type="checkbox"/>	Ignitable + Reactive wastes not stored in tank 
OTH	1			Section 725.299: Special Requirements for Incompatible Wastes Is Section 725.117 being complied with whenever incompatible wastes are stored in the same tank system or in a tank system which has not been decontaminated? Yes ____ No ____ N/A <input checked="" type="checkbox"/>			<input checked="" type="checkbox"/>	no incompatible wastes stored

Area	Class	90 Day EOU Req	Key Ltr	Requirement	In Apparent Compliance		Not Applicable	Remarks or Comment No
			Sub Sec		Yes	No		
01H	1			Section 725.300: Waste Analysis and Trial Tests In addition to complying with 725.113, whenever a tank is used to treat chemically or to store a hazardous waste that is substantially different than that waste previously stored, or to treat chemically a hazardous waste with a substantially different process, then has the owner:			<input checked="" type="checkbox"/>	no new wastes stored 
			a 1) Conducted a waste analysis and trial treatment or storage tests? Yes _____ No _____ N/A _____ or b 2) Obtained written, documented information to show that the proposed treatment or storage will meet the requirements of 725.294(a)? Yes _____ No _____ N/A _____ NOTE: Section 725.301: Generators of 100 to 1000 kg/mo. is included in the checklist for Reduced Requirement Generators.					

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility: Techalloy Illinois Inc
 U.S. EPA ID No.: 1LD005178975/1110900003
 Street: Olson + Jefferson
 City: Union State: IL Zip: 60180
 Telephone: 815-923-2131

Inspection Date: 1/16/92 Time: 10⁰⁰-12³⁰ (am/pm)

Weather Conditions: 5°

Inspectors:

Name	Agency/Title	Telephone
<u>Tina Kovasznay</u>	<u>IEPA/EPs</u>	<u>708-591-5900</u>

Facility Representatives:

<u>George Miller</u>	<u>Maintenance Super</u>	<u>815-923-2131</u>
<u>Scott Carr</u>	<u>Treat. Room Op.</u>	<u>"</u>

See Appendix B to determine which of the following LDR waste categories the facility manages:

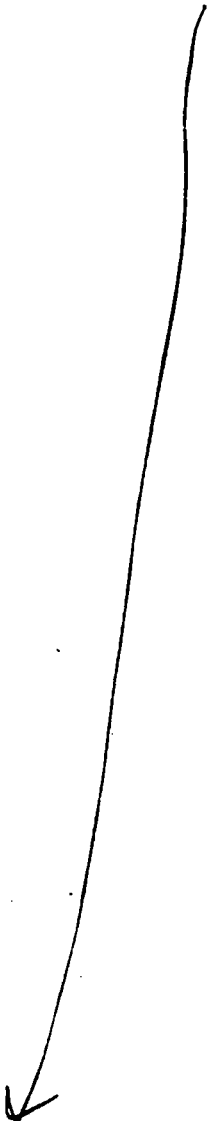
	<u>Generate</u>	<u>Transport</u>	<u>Treat</u>	<u>Store</u>	<u>Dispose</u>
F001-F005 Solvents	_____	_____	_____	_____	_____
F020-F023 and F026-F028	_____	_____	_____	_____	_____
California List*	_____	_____	_____	_____	_____
First Third [40 CFR 268.10]	_____	_____	_____	_____	_____
Second Third [40 CFR 268.11]	<u>✓</u>	_____	_____	_____	_____
Third Third [40 CFR 268.12]	<u>✓</u>	_____	_____	_____	_____

* See Appendix A

INSPECTION SUMMARY

Processes That Generate LDR Wastes:

*See attached narrative +
Waste disposition sheet*



LDR Waste Management:

Summary:

Signature:

Tina Kovasznay

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

II. WASTE IDENTIFICATION

A. List waste codes which the facility handles in each of the following LDR categories*:

1. F001 through F005 spent solvents:

2. F020-F023 and F026-F028 dioxin-containing wastes:

3. California List Wastes (See Appendix A):

4. First Third Wastes [40 CFR 268.10]:

5. Second Third Wastes [40 CFR 268.11]:
F006/D003, D003/F008, F006
6. Third Third Wastes [40 CFR 268.12]**:
D002/D007, D007, D001/D002/D003, D003/F008, F006/D003, D001

*See Appendix B.
** Note: Effective 09/25/90, large quantity generators and TSDs are required to use the toxicity characteristic leaching procedure (TCLP) instead of the extraction procedure (EP) for determining the toxicity characteristic (TC). Small quantity generators must comply with this new requirement by 03/29/91. Wastes which exhibit TC, but do not exhibit EP, will be considered "newly identified" wastes. They will be regulated under 40 CFR Part 268 only after they are evaluated by U.S. EPA, even if they are characteristic for a constituent previously covered under the EP toxicity characteristic (55 FR 22531).

B. Waste Code Determination

1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?

Yes ☒ No ☐

If no, list below:

<u>Assigned Classification</u>	<u>Correct Classification</u>
_____	_____
_____	_____
_____	_____
_____	_____

*Area of concern includes: California List/waste categories with more stringent treatment standards; listed/characteristic; multi-source/single-source leachate; P and U waste codes/F and X wastes; and waste code carry through principle.

Comments: _____

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? [40 CFR 268.9(a)]

Yes ☒ No ☐ NA ☐

Comments _____

3. Has multi-source leachate been assigned the F039 waste code?* [40 CFR 261.31]

Yes ☐ No ☐ NA ☒

*Leachate derived exclusively from F020-F023 and/or F026-F028 dioxin wastes retains the individual waste codes.

If yes, was single-source leachate combined to form multi-source leachate? [55 FR 22623]

Yes ☐ No ☐

Comments _____

C. Does the facility handle the following wastes (national capacity variances)?

1. F001-F005 contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.30(c)]

Yes ☐ No ☒ List _____

2. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.31(b)]

Yes ☐ No ☒ List _____

3. California list contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (expires - 11/08/90). [40 CFR 268.32(d)(2)]

Yes ☐ No ☒ List _____

4. K048-K052 petroleum wastes (nonwastewaters; expires - 11/08/90). [40 CFR 268.35(b)]

Yes ☐ No ☒ List _____

5. Soil and debris contaminated with wastes that had treatment standards based on incineration set in the Second Third rule - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U190, U221, U223, U235 (expires - 06/08/91). [40 CFR 268.34(d)]

Yes ☐ No ☒ List _____

6. Soil and debris contaminated with wastes that had treatment standards set in the Third Third rule based on incineration, mercury retorting, or vitrification. See Appendix A: (expires - 05/08/92). [40 CFR 268.35(e)]

Yes ☐ No ☒ List _____

7. The following nonwastewaters - F039, K031, K084, K101, K102, K106, P010, P011, P012, P036, P038, P065, P087, P092, U136, U151. (expires -05/08/92). [40 CFR 268.35(c)]

Yes ☐ No ☒ List _____

8. The following wastes identified as hazardous based on a characteristic alone: D004 (nonwastewaters), D008 (lead materials stored before secondary smelting), D009 (nonwastewaters) (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ☐ No ☒ List _____

9. Inorganic solid debris as defined in 40 CFR 268.2(g)*; includes chromium refractory bricks carrying EPA Hazardous Waste Nos. K048-K052 (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ☐ No ☒ List _____

*Note: Incorrect reference [40 CFR 268.2(a)(7)] in Third Third rule.

10. RCRA hazardous wastes that contain naturally occurring radioactive materials (expires - 05/08/92). [40 CFR 268.35(c)]

Yes ☐ No ☒ List _____

11. Wastes listed in 40 CFR 268.10, 268.11, and 268.12 that are mixed radioactive/hazardous wastes (expires - 05/08/92)*. [40 CFR 268.35(d)]

Yes ☐ No ☒ List _____

*Note: 40 CFR 268.10 and 268.11 wastes incorrectly omitted from this variance in the Third Third rule.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

III. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification*

*Note: This information is generally available on LDR notifications. If not, waste profile data and other documentation should be checked.

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each F-solvent?

Yes ___ No ___ NA ☒

If available, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
_____	_____	_____
_____	_____	_____
_____	_____	_____

*Less than 1% by weight total organic carbon (TOC), or less than 1% by weight total F001-F005 solvent constituents listed in 40 CFR 268.41, Table CCVE. [40 CFR 268.2(f)(1)]

Comments _____

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard for each dioxin waste?

Yes ___ No ___ NA ☒

If yes, list each waste code and check the correct treatability group.

Waste Code	Wastewater*	Nonwastewater
_____	_____	_____
_____	_____	_____
_____	_____	_____

Comments _____

*Less than 1% TOC by weight and less than 1% total suspended solids (TSS) by weight. [40 CFR 268.2(f)]

3. First, Second, and Third Third Wastes:

- a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste?

Yes ☒ No ___ NA ___

If available, list each waste code and check the correct treatability group:

Waste Code Subcategory Wastewater* Nonwastewater

* Less than 1% TOC by weight and less than 1% total suspended solids (TSS) with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. [40 CFR 268.2(f)(2) and (3)]

Comments _____

- b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9 (b)]

Yes ☒ No ____ NA ____

- c. Does the generator specify alternative treatment standards for lab packs?*

Yes ____ No ____ NA ☒

*Use of the alternative treatment standards is not required. [55 FR 22629]

If yes, do lab packs only contain the following wastes? [40 CFR 268.42(c)(2)]

____ Organometallics: 40 Part 268, Appendix IV constituents
____ Organics: 40 CFR Part 268, Appendix V constituents

*Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. [55 FR 22629]

- d. Does the generator specify alternative treatment standards for F039 multi-source leachate?*

Yes ____ No ____ NA ☒

*Use of the alternative treatment standards is required. [55 FR 22619]

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes? [55 FR 22675]

- a. Liquid hazardous wastes containing PCBs ≥ 50 ppm:

Yes ____ No ____ NA ____

If yes, check the appropriate treatability group:

____ 50 to 500 ppm PCBs
____ ≥ 500 ppm PCBs

N/A



- b. Listed or characteristic wastes containing $\geq 1,000$ mg/l (liquids) or mg/kg (non-liquids) HOCs, which are not listed or characterized by the HOC content

Yes ___ No ___ NA ___

If yes, check the appropriate treatability group:

- ___ Dilute HOC wastewater (1,000 mg/l to 10,000 mg/l HOCs)
 ___ All other HOCs greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non-liquids)

- c. Liquid hazardous wastes that exhibit a characteristic and also contain ≥ 134 mg/l nickel and/or ≥ 130 mg/l thallium

Yes ___ No ___ NA ___

5. National Capacity Variance Wastes: Have all applicable California List prohibitions been identified for wastes covered under national capacity variances? (See Appendix A.)

Yes ___ No ___ NA ___

If a wastestream contains a mixture of wastes, and a variance only applies to some of the waste codes, has the generator identified all applicable treatment standards and California List prohibitions? (See Appendix A.)

Yes ___ No ___ NA ___

If California List prohibitions apply to wastestreams managed by the generator, complete the following table for each waste code, noting the date on which relevant national capacity variances expire.

Waste Code	Cal List Applicability	Expiration Date
___	___	___/___/___
___	___	___/___/___
___	___	___/___/___

Comments _____

6. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes ___ No ___ NA ___

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method, and documentation of approval. [40 CFR 268.42(b)]

Waste Code	Required Technology	Alternative Method	Approval
___	___	___	___
___	___	___	___
___	___	___	___

Comments _____

7. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes ☐ No ☒

If yes, did the generator select the most stringent treatment standards?
[40 CFR 268.41(b) and 268.43(b)]

Yes ☐ No ☐

Comments _____

B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation?* [268.7(a)]

Yes ☒ No ☐

*Note: This determination may be made at the point of disposal. If the waste only has a prohibition level in effect.

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes ☒ No ☐

Comments _____

2. Which of the following analytical methods does the generator employ?*

*Note: A "No" answer to applicable questions b. through d. does not necessarily constitute a violation. However, knowledge of waste is rarely adequate if a generator certifies that treatment standard criteria have been met.

- a. Knowledge of waste:

Yes ☐ No ☒

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]

- b. TCLP*: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP? (BDAT*** = stabilization/immobilization technology)

Yes ☒ No ☐ NA ☐

*TCLP = Toxicity Characteristic Leaching Procedure (40 CFR Part 268, Appendix I, EPA Test Method-1311)

**See Appendix C for exceptions.

***BDAT = best demonstrated-available technology. See Appendix A.

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

- c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis?* (BDAT = destruction/removal technology)

Yes ☐ No ☐ NA ☒

*See Appendix C for exceptions.

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

- d. PFLT*: Was PFLT used to determine if California List constituents were contained in *liquid* hazardous waste?

Yes ☐ No ☐ NA ☒

*PFLT = Paint Filter Liquids Test (Test Method 9095, EPA Publication No. 84-6)

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. [40 CFR 268.7(a)(5)]

3. Does the generator treat restricted wastes in 90-day tanks or containers regulated under 40 CFR 262.34 (permissible in some states)?

Yes ☐ No ☒ (If No, go to 4.)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes ☐ No ☐

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? 40 CFR 268.7(a)(4)]

Yes ☐ No ☐ (If No, go to 4.)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

- ☐ Based on a detailed chemical and physical analysis of a representative sample
☐ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements

No
longer
treat
on site

GEN

Has the plan been filed with the Regional Administrator (return receipt, Federal Express slip, etc. required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes ☐ No ☐

Comments _____

4. Dilution Prohibition [40 CFR 268.3]:

- a. Does the generator mix prohibited* wastes with different treatment standards?

*See Appendix E for distinction between restricted and prohibited wastes.

Yes ☐ No ☒ (If No, go to b.)

List the wastes _____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes ☐ No ☐

Comments _____

- b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes ☐ No ☒ (If No, go to c.)

Check appropriate category:

- ☐ Dilutes to meet treatment standards
☐ Dilutes to render waste non-hazardous.

Do the wastes fall into the following categories? (Check if appropriate.) [40 CFR 268.3(b)]

- ☐ Managed in treatment systems regulated under the Clean Water Act
☐ Non-toxic* characteristic wastes
☐ Treatment standard specified in 40 CFR 268.41 or 268.43

*Non-toxic = 9001(except high TOC nonmetals), 9002, and 9003(except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted.

- c. Based on an assessment of points a. and b., and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes ☐ No ☒

Comments _____

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes ☐ No ☐ NA ☒

C. Management

1. On-Site Management

*No longer
treat on site*

Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 (small quantity generator* - 180) days, or disposed on site?

Yes ☐ No ☒

(If yes, the TSD Checklist must also be completed.)

* Small quantity generator = generator of greater than or equal to 100 kg/mo. but less than 1,000 kg/mo. hazardous waste, or less than 1 kg/mo. acutely hazardous waste

Comments _____

- b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to an NPDES permit are not prohibited (if applicable)? [55 FR 22662]

Yes ☐ No ☐ NA ☐

- c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR Part 268 treatment standards are met?* [40 CFR 268.9(d)]

Yes ☐ No ☐ NA ☐

*This applies to both concentration-based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 CFR 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

2. Off-Site Management: Waste Exceeds Treatment Standards

- a. Does the generator ship any waste that exceeds treatment standards /prohibition levels (not subject to a national capacity variance) to an off-site treatment or storage facility?

Yes ☒ No ☐ (If No, go to 3.)

Identify waste code(s) and off-site treatment or storage facilities to which wastes are shipped.

Waste Code

Receiving Facility

*See waste
disposition
form*

Does the generator provide a notification to the treatment or storage facility?
[40 CFR 268.7(a)(1)]

Yes ☒ No ☐ (If No, go to 3.)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes ☐ No ☐ NA ☒

b. Is a notification sent with each waste shipment?

Yes ☒ No ☐

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ☐ No ☐ (If No, go to 3.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>
_____	_____
_____	_____
_____	_____

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ☐ No ☐

3. Off-Site Management: Waste Meets Treatment Standards

a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes ☐ No ☒ (If No, go to 4.)

Identify waste code(s) and off-site disposal facilities:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____
_____	_____

Does the generator provide a notification and a certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]?

Yes ☐ No ☐ (If No, go to d.)

- b. Are a notification and a certification sent with each waste shipment?

Yes ☐ No ☐

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) (small quantity generator only)?

Yes ☐ No ☐ (If No, go to c.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>

Did the small quantity generator provide a notification and a certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ☐ No ☐

- c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes ☐ No ☐ NA ☐ (If No or NA, go to 4.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>

Are a notification and a certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]?

Yes ☐ No ☐

4. Off-Site Management: Wastes Subject to Variances, Extensions, or Petitions

- a. Does the generator ship wastes to a treatment, storage, or disposal facility which are subject to a national capacity variance (40 CFR Part 268, Subpart C), or case-by-case extension (40 CFR 268.5)?

Yes ☐ No ☒ (If No, go to 5.)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>

Does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal? [40 CFR 268.7(a)(3)]

Yes ☐ No ☐

b. Is a notification sent with each waste shipment?

Yes ☐ No ☐

If no, is the waste subject to a tolling agreement pursuant to 40 CFR 262.20(e) (small quantity generator only)?

Yes ☐ No ☐ (If No, go to 5.)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>

Did the small quantity generator provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes ☐ No ☐

5. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

Yes ☒ No ☐

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes ☐ No ☐ NA ☒

Do LDR documents reflect proper management of wastes previously covered under expired national capacity variances, case by case extensions and the soft hammer provision*?

Yes ☐ No ☐ NA ☒

*See Appendix B. Note that the soft hammer provision expired as of 05/08/90. Soft hammer wastes which had treatment standards established in the Third Third rule were granted a minimum 90-day national capacity variance to 08/08/90.

Comments

D. Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes

- no longer
treat

Yes _____ No ☒ _____ (If No, do not complete this section.)

List types of waste treatment units and processes:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Units and Processes</u>
-------------------	--------------------------	--------------------------------------

- 2 Are treatment residuals generated from these units?

Yes _____ No _____

Comments _____

3. Are residuals further treated, stored for greater than 90/180 days, or disposed on site?

Yes _____ No _____ NA _____

(If yes, the TSD checklist must also be completed.)

E Additional Comments, Concerns, or Issues Not Addressed in the Checklist:

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Document # Page Number

0060A 46

Variable Number Variable (Variable MUST be completed in the order they appear)

1 1110900003 - McHenry County

Techalloy Illinois Inc.

ILD005178975

2 (Date)

3 Techalloy Illinois Inc.

Attn: George Miller

Olson + Jefferson

Union, IL 60180

4 Dear Mr. Miller

5 (Delete Paragraph A)

6 Techalloy Illinois Inc.

7 Attachment A

8 The Illinois Environmental Protection Agency

1701 S. First Ave. / Suite 600 / Maywood, IL 60153

9

10

11

12 (Delete Paragraph C)

13 Tina Kovaszay

708-531-5900

15 tmk

8: Maywood, Tina Kovaszay

- 69 The frequency of inspections on the storage tanks are not being documented in an inspection schedule.
- 71 The results of inspections of the storage tanks are not being documented.
- 98 The quantity of waste in the storage tanks is not being documented in an operating record.
- 128 The most current closure plan which includes the storage tanks was not available at the time of the inspection.
- 227 A written assessment has not been conducted on the storage tanks.
- 232 No secondary containment has been provided for the storage tanks.
- 238 Inspections of the storage tanks are not being documented.



11695
11696

VIOLET CORRELATION SHEET

	SUMMARY OF VIOLATIONS	NARRATIVE	INSPECTION CHECKLIST	PECL/CIL	COMMENTS
CIV II	7.25.1126	✓	✓	✓	Firg. of inspections are not documented in inspection schedule.
CIV II	7.25.1154	↓	↓	✓	Results of inspection at 02 are not documented.
CIV 2	7.25.112	↓	↓	✓	Quantity of waste in tank is not being documented in reports.
CIV I	7.25.2120	↓	↓	✓	Most current closure plan (w/size) was not on file at time of inspection.
CIV I	7.25.2918	↓	↓	✓	No further assessment on size (per 2 nd containment).
CIV I	7.25.2930	↓	↓	✓	No 2 nd containment for size (see 7 yrs, 15 yrs, para 1-12 H1).
CIV II	7.25.29120	↓	↓	✓	Tank inspections are not being documented.

Illinois Environmental Protection Agency

1701 First Avenue, Maywood, IL 60153

708/531-5900

June 10, 1992

David Ullrich, Director
Waste Management Division
U.S. Environmental Protection Agency
Region V
77 W. Jackson Boulevard
Chicago, IL 60604-3590

Re: 1110900003 - McHenry Co.
Techalloy Illinois, Inc.

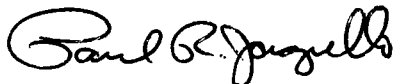
Dear Mr. Ullrich:

Enclosed you will find a copy of a RCRA inspection report. The inspection was conducted at the Techalloy facility on January 16, 1992 and is being sent to USEPA for informational purposes.

Any questions regarding the January 16, 1992 inspection can be directed to Tina Kovaszny of the IEPA's Maywood office at 708/531-5900.

I am the attorney assigned to this matter and I can be reached at the Maywood office at 708/531-5900.

Sincerely yours,



Paul R. Jagiello
Assistant Counsel
Division of Legal Counsel

PRJ:bh:6636B

RECEIVED

JUN 15 1992

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

ILD 005 178 975

DONOVAN LEISURE, ROGOVIN, HUGO & SCHILLER
1250 TWENTY-FOURTH STREET, N.W.
WASHINGTON, D.C. 20037-1124
TELEPHONE: 202-467-8300
FAX: 202-467-8484

DONOVAN LEISURE NEWTON & IRVINE
333 SOUTH GRAND AVENUE
LOS ANGELES, CALIFORNIA 90071
TELEPHONE: 213-253-4000
FAX: 213-617-2368

Law Offices of
Donovan Leisure Newton & Irvine
30 Rockefeller Plaza
New York, N.Y. 10112

TELEPHONE: 212-632-3000
FACSIMILE: 212-632-3321

RECEIVED
DEC 05 1991
OFFICE OF THE
Waste Management Division
U.S. EPA, REGION V
DONOVAN LEISURE NEWTON & IRVINE
130 RUE DU FAUBOURG SAINT-HONORE
75008 PARIS
TELEPHONE: 1-42-25-47-10
FAX: 1-42-56-08-06
WRITER'S DIRECT DIAL NUMBER:
212-632 -3161

December 2, 1991

Ms. Jacqueline Kline
Office of Regional Counsel
United States Environmental
Protection Agency - Region 5
77 Jackson
Metcalf Bldg.
Chicago, Illinois 60610

RE: Techalloy Company, Inc.
ILD005 178 975

Dear Ms. Kline:

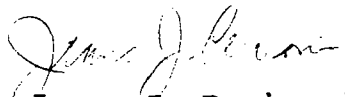
This letter will reflect that we had a discussion on Wednesday, November 27, 1991, with regard to the letter, dated on or about November 18, 1991, sent by Joseph Boyle, Chief, RCRA Enforcement Branch, Region 5 of the United States Environmental Protection Agency ("EPA") to Henry Lopes of Techalloy.

My understanding is that this letter constitutes an initial response by Techalloy within fifteen (15) days of the receipt of the letter from Mr. Boyle to Techalloy, as required, and reflects that after making inquiries, you will contact me concerning the future course of action to be taken by EPA.

As I mentioned to you on the telephone, it is Techalloy's desire to continue to work cooperatively with the Illinois Environmental Protection Agency, under a voluntary clean up program to clean up the groundwater in the vicinity of the Union plant.

Thank you very much for your cooperation.

Very truly yours,


James J. Periconi

cc: Mr. Joseph M. Boyle

NOV 06 1990

5HR-12

Mr. George Miller
Maintenance Supervisor
Techalloy Company, Inc.
P.O. Box 423 (Olson & Jefferson Streets)
Union, Illinois 60180-0423

Re: Techalloy Company, Inc.
ILD 005 178 975

Dear Mr. Miller:

The United States Environmental Protection Agency has reviewed the information which you submitted to this office on October 29, 1990. The stated actions appear to adequately address the land disposal restrictions deficiencies outlined in our October 17, 1990, Notice of Violation.

Your cooperation and efforts in this matter are appreciated. Should you have further questions, please feel free to contact Ms. Barbara Russell of my staff at (312) 353-7922.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

cc: Glenn Savage, IEPA, FOS
William Radlinski, IEPA

5HR-B.RUSSELL:ev:10/5/90:3-7928:FILENAME: Miller

SIGNATURE/INITIAL CONCURRENCE REQUESTED - RCRA ENFORCEMENT BRANCH (REB)									
TYP.	AUTH	IL/IN TES CHIEF	MI/WI TES CHIEF	MN/OH TES CHIEF	IL/MI/WI EPS CHIEF	IN/MN/OH EPS CHIEF	REB BRANCH CHIEF	RCRA ASSOC. DIR.	WMD DIVISION DIRECTOR
91 11/6/90	BR 11/6/90				<i>Typed Ward acting 11/6/90</i>				



THREE HAWTHORN PARKWAY
VERNON HILLS, ILLINOIS 60061
PHONE: 708-918-4000

29 October 1990

Mr. Paul E. Dimock, Chief (5HRS-12)
IL/MI/WI Enforcement Program Section
U.S. Governmental Protection Agency
230 South Dearborn Street
Chicago, IL 60604

RECEIVED

NOV 08 1990

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Subject: Notice of Violation
Techalloy Company, Inc.
ILD 005 178 975

Dear Mr. Dimock:

On 26 October 1990, I spoke with Ms. Barbara Russell regarding the violations cited in your 22 May 1990 Notice of Violation. Based on the conversation on 26 October 1990 she suggested a letter response indicating the actions in which we have taken to correct this situation. Specifically, the violations you cited included:

1. Failure to determine the appropriate treatability group of the waste as required by Section 268.41;
2. Failure to provide a complete separate written notice attached to the manifest for each waste shipment of restricted wastes with the U.S. EPA Hazardous Waste Numbers, applicable treatment standards, manifests numbers and waste analysis data, where available, as required by Section 268.7(a)(1);
3. Failure to retain an on-site copies of all notifications, demonstrations and certifications for a period of five years as required by Section 268.7(a)(6).

As Ms. Russell and I discussed, if you violate the first item, 268.41, you invariably violate the other two. Our original classification of the cyanide bath filters was as a reactive waste, D003. When Illinois EPA's Ms. Underwood conducted her inspection of the facility in March, 1990, she advised the we change the listing to a F008. Since that time, we have transported the waste as an F008 waste. The proper written notices are attached, and copies of all notifications, demonstrations and certifications are maintained on site and will be maintained for five years. In addition, we have modified the Notification of Hazardous Waste Activity to reflect this reclassified waste type.

IH206



Mr. Paul E. Dimock

-2-

29 October 1990

If you have any questions regarding our compliance status with regard to the Notice of Violation, please do not hesitate to contact me at the above-noted phone number or Mr. Miller at (815) 923-2131.

Very truly yours,

ROY F. WESTON, INC.

A handwritten signature in dark ink, appearing to read "John W. Thorsen".

John W. Thorsen, P.E.
Vice President

JWT/ieh

cc: Ms. Barbara Russell, U.S. EPA
Mr. Glenn Savage, Illinois EPA
Mr. George Miller, Techalloy

IH206

OCT 17 1990

5HR-12

Mr. George Miller
Maintenance Supervisor
Techalloy Company, Inc.
P.O. Box 423 (Olson & Jefferson Streets)
Union, Illinois 60180-0423

Re: Second Notice of Violation
Techalloy Company, Inc.
ILD 005 178 975

Dear Mr. Miller:

On May 22, 1990, a Notice of Violation (NOV) was sent to you citing land disposal restriction violations discovered at the above-referenced facility during a Resource Conservation and Recovery Act (RCRA) inspection on March 22, 1990. The NOV indicated that you should submit to the United States Environmental Protection Agency (U.S. EPA) documentation demonstrating that the cited violations have been corrected. The violations are listed below.

1. Failure to determine the appropriate treatability group of the waste as require by Section 268.41;
2. Failure to provide a complete separate written notice attached to the manifest for each shipment of restricted wastes with the U.S. EPA hazardous waste numbers, the applicable treatment standards, manifest numbers, and waste analysis data, where available, as required by Section 268.7(a)(i); and
3. Failure to retain on-site copies of all notifications, demonstrations, and certifications for a period of 5 years as required by Section 268.7(a)(6).

To date U.S. EPA has not received any documentation indicating that the above cited violations have been adequately addressed. You are hereby requested to submit to the U.S. EPA, within 15 days of receipt of this letter, documentation addressing the violations cited in the May 22, 1990, NOV. Failure to correct these violations may subject the facility to further Federal enforcement action.

If you have any questions regarding this correspondence, please contact Ms. Barbara Russell of my staff at (312) 353-7922.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

cc: Glen Savage, IEPA
William Radlinski, IEPA
5HR-12:B.Russell:ev:10/12/90:FILENAME:techalloy

GW 10-16-90

RCRA ENFORCE- MENT	DEB STAFF	DATE
INIT. DATE	BR 10/16/90	REP acting 10/16/90

B. Russell (5HR-12)
P 155 069 667

RECEIPT FOR CERTIFIED MAIL
NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL
(See Reverse)

Sent to George Miller	
Street and No. P.O. Box 423 (Olson/Jefferson)	
P.O. State and ZIP Code Union, Illinois 60180-0423	
Postage	\$ 25
Certified Fee	\$.25
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	\$.90
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	\$ 2.00
Postmark or Date	

PS Form 3800, June 1985

CHICAGO, ILL. 60608
OCT 12 1990
ST

● **SENDER:** Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.
Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. (Extra charge) 2. ☐ Restricted Delivery (Extra charge)

3. Article Addressed to: Mr. George Miller Maintenance Supervisor Techalloy Company, Inc. P.O. Box 423 (Olson & Jefferson Streets) Union, Illinois 60180-0423	4. Article Number P 155 069 667 Type of Service: <input type="checkbox"/> Registered <input type="checkbox"/> Insured <input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD <input type="checkbox"/> Express Mail <input type="checkbox"/> Return Receipt for Merchandise Always obtain signature of addressee or agent and DATE DELIVERED .
5. Signature - Address X <i>[Signature]</i>	8. Addressee's Address (ONLY if requested and fee paid)
6. Signature - Agent X	
7. Date of Delivery 10-12-90	

MAY 22 1990

5HR-12

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

George Miller
Maintenance Supervisor
Techalloy Company, Inc.
P.O. Box 423 (Olson & Jefferson Streets)
Union, Illinois 60180-0423

Re: Notice of Violation
Techalloy Company, Inc.
ILD 005 178 975

Dear Mr. Miller:

On March 22, 1990, the Illinois Environmental Protection Agency (IEPA), representing the U.S. Environmental Protection Agency, conducted a Resource Conservation and Recovery Act (RCRA) inspection of the above-referenced facility. The purpose of the inspection was to determine the facility's compliance with the applicable hazardous waste management requirements of RCRA, including the Federal land disposal restrictions. The land disposal restrictions for F001-F005 spent solvents and dioxin-containing wastes became effective on November 8, 1986, for California List hazardous wastes on July 8, 1987, for the First Third hazardous wastes on August 8, 1988, and for the Second Third hazardous wastes on June 8, 1989, (40 CFR Part 268 and revisions to 40 CFR Parts 260-265 and 270-271).

With respect to the land disposal restrictions section of the inspection, your facility was found to be in violation of the following:

1. Failure to determine the appropriate treatability group of the waste as required by Section 268.41;
2. Failure to provide a complete separate written notice attached to the manifest for each shipment of restricted wastes with the U.S. EPA hazardous waste numbers, the applicable treatment standards, manifest numbers, and waste analysis data, where available, as required by Section 268.7(a)(1); and
3. Failure to retain on-site copies of all notifications, demonstrations, and certifications for a period of 5 years as required by Section 268.7(a)(6).

A copy of the inspection report is enclosed for your records. Please submit to this office, within thirty (30) days of receipt of this Notice of Violation, documentation demonstrating that the above cited violations have been corrected and indicating what measures have been initiated to assure future compliance. Failure to correct the violations may subject the facility to further Federal enforcement action.

If you have any questions regarding this correspondence, please contact Ms. Barbara Russell of my staff at (312) 353-7922.

Sincerely yours,

Paul E. Dimock, Chief
IL/MI/WI Enforcement Program Section

Enclosure

cc: Harry Chappel, IEPA-CMS
Glenn Savage, IEPA-FOS
Scott Carr, Techalloy
5HR-12:B.RUSSELL:ev:3-7928:5/16/90:DISK #1:FILENAME:GMILLER

EV 5-21-90

RCRA ENFORCE- MENT	PEB STAFF	RCRA SEC. 304
INIT. DATE	5/21/90	5/21/90

B. Russell SHR-12
P 155 069 938

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

PS Form 3800, June 1985

Sender	
George Miller	
Street and No.	
P.O. Box 423 Olson's Jefferson St.	
P.O., State and ZIP Code	
Union, IL 60180-0423	
Postage	\$.65
Certified Fee	.85
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	.90
Return Receipt showing to whom Date, and Address of Delivery	
TOTAL Postage and Fees	\$ 2.40
Postmark or Date	

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and restrictions for additional service(s) requested.

1. ☒ Show to whom delivered, date, and addressee's address. 2. ☐ Restricted Delivery
↑(Extra charge)↑

3. Article Addressed to	4. Article Number
George Miller Maintenance Supervisor Techalloy Company, Inc. P.O. Box 423 (Olson's Jefferson Streets) Union, IL 60180-0423	P 155-069 938
5. Signature - Addressee	Type of Service:
X Koubec	<input type="checkbox"/> Registered <input type="checkbox"/> Insured
6. Signature - Agent	<input checked="" type="checkbox"/> Certified <input type="checkbox"/> COD
X	<input type="checkbox"/> Express Mail
7. Date of Delivery	Always obtain signature of addressee or agent and DATE DELIVERED.
5-23-90	8. Addressee's Address (ONLY if requested and fee paid)

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Teachalloy Company, Inc.
U.S. EPA I.D. No. : ILD005 178975 (1110900003)
Street: P.O. Box 423 (Olson & Jefferson Streets)
City: Union State: IL Zip: 60180-0423
Telephone: 815/923-2131

Owner/Operator:
Street: Teachalloy Company Inc. / P.O. Box 423
City: Union State: IL Zip: 60180-0423
Telephone: 815/923-2131

Inspection Date: 3/22/90 Time: 9:30 - 1:00 pm
Weather Conditions: 40° F, raining

Name	Agency/Title	Telephone
Michelle Underwood	IEPA / EPSI	708/345-9780

Facility Representative: George Miller ^{Teachalloy} Maint Supervisor 815/923-2131
Scott Carr Teachalloy / Maint & Treatment room operator / 815-923-2131

	<u>Generate</u>	<u>Transport</u>	<u>Treat</u>	<u>Store</u>	<u>Dispose</u>
F-Solvent	_____	_____	_____	_____	_____
Dioxin	_____	_____	_____	_____	_____
California List	<u>✓</u>	_____	_____	_____	_____
First Third	<u>✓</u>	_____	_____	_____	_____
Second Third	_____	_____	_____	_____	_____

RECEIVED
NOV 22 1989
IEPA/DLPC,

INSPECTION SUMMARY

Processes That Generate LDR Wastes

Techalloy dies wire to specific diameters.
The wire is pickled to clean and plated.
wastes from these 2 processes are D002, D007 (pickling)
and F008 (plating filter waste).

LDR Waste Management

All wastes go for treatment to Envirite or Clean Harbors or
Cyanokem. Please narrative and waste disposition sheet.

Summary

[268.7a] Plating waste (F008) was incorrectly being identified and manifested
as D003. No land ban notifications were accompanying these
loads. copies of land ban notifications were not being kexoxed and
kpt with manifests until 1990 (268.7a)(6).

1110900003 - McHenry County
Techalloy Company, Inc.
ILD005178975
3/22/90

NARRATIVE

I. INTRODUCTION

Techalloy manufactures wire by drawing it through various sizes of dies to reduce its diameter. Processes include heating the wire in ovens, pickling to clean and remove scale, dieing, annealing (heating wire up to make more pliable) and plating.

II. WASTES GENERATED

Hazardous

Spent Acids (Pickle Liquor) (D002, D007) - This waste is generated from spent pickling baths that remove scale from wire (see photos 3, 4, 5). Approximately 3,000 gallons/1-3 times a month are generated and manifested to Enviroline in Harvey, IL for treatment. The waste is removed by tank truck directly from the process and currently no waste is accumulated on-site.

Pickling Rinse Waters (D002, D007) - This waste is generated from rinsing the wire off between acid baths (tanks are located beneath acid baths - see photos 3, 4, 5). Approximately 5,000 gallons/1-3 times a month are generated and manifested to Clean Harbors of Chicago, Inc. in Chicago, IL for treatment. The waste is removed by tank truck directly from the two tanks (10,500 and 16,500 gallons) and currently no waste is on-site.

ADS Sludge (D002, D007) - This waste is generated from cleaning the rinsate tanks. Approximately 605 gallons/2 months (varies) are generated and manifested to Clean Harbors of Chicago, Inc. in Chicago, IL for treatment. The waste is accumulated in drums and currently no waste is on-site.

Used Plating Filters (F008, D003) - This waste is generated from changing the filters in the plating tanks (see photos 1,2). Approximately 110 gallons/year are generated and manifested to Cyanokem in Detroit, MI for treatment and disposal. The filters are accumulated in drums and currently no waste is on-site.

Non-Hazardous

SP-6 Sludge - This waste is generated from cleaning the tank of soap coating for drawing wire. Approximately 165 gallons/2-3 years are generated and manifested to Clean Harbors of Chicago, Inc. in Chicago, IL for treatment. The waste is accumulated in drums and currently no waste is on-site.

Waste Oils (high viscosity) - This waste is generated from drawing heavier wires that require high viscosity oils. Approximately 2585 gallons/year are generated and manifested to Clean Harbors of Braintree, Inc. in Braintree, MA for incineration. The waste is generated in drums and currently no waste is on-site.

Waste Oils (water soluble) - This waste is generated from cooling dies in machines. Approximately 275 gallons/year are generated and manifested to Clean Harbors, of Chicago, Inc. in Chicago, IL for treatment. The waste is generated in drums and currently no waste is on-site.

Waste Oils (crankcase) - This waste is generated from vehicle maintenance of forklifts and machinery. Approximately 1430 gallons/year are generated and manifested to American Chemical Service in Griffith, IN for fuel blending. The waste is accumulated in drums and currently no waste is on-site.

Used Filters - This waste is generated from coating wire with Molybdenum DiSulfide. Rates of generation vary and the fillers are being disposed of with the general refuse. Currently no waste is on-site.

III HAZARDOUS WASTE UNITS

T01-Tank Treatment

Techalloy has two 1,000 gallon neutralization tanks for treating spent acids and rinsates from the pickling house (see photo 8). These tanks are listed under water pollution control permit #1986-ED-0994 for a total recycling system. Since there is no discharge from this wastewater treatment system the tanks are regulated under RCRA and will be required to close under the regulations. The system was inactive at the time of the inspection and has not operated since 11/8/88. The unit is on stand-by if haulers are unable to come out and remove spent pickle liquors from the process tanks.

T04 - Container Treatment

Techalloy has one 3,000 gallon tanker truck used for treating cyanide waste from the plating process by adding bleach (see photo 7). This unit was inactive at the time of the inspection and has not been used since 4/9/85. The current plating system employs heating, evaporating and filtering the plating tanks so that the only waste that exists is filter residue (F008, D003) (see photos 1,2).

IV ADDITIONAL OBSERVATIONS

Techalloy has one accumulation area for hazardous and non-hazardous drums located outside on the north end of the building. The area is graveled and fenced within the outer lot.

Techalloy has two accumulation tanks (10,500 gallons and 16,500 gallons) located in the pickling house that have not been identified in the past (see site sketch). The tanks accumulate rinsate waters from the pickling process (see photos 3,4,5).

V COMPLIANCE WITH GENERATOR REGULATIONS

722.111 - Failure to make a correct waste determination on the used plating filters (F008, D003).

722.134a1(725.291) - No written assessment for the two 1,000 gallon treatment tanks (T01).

722.134a1(725.293a) - No secondary containment for the two (10,500 gallons and 16,500 gallons) pickling rinse water accumulation tanks.

722.134a3 - Treatment tanks (T01) and accumulation tanks (rinse waters) need to be identified with the words Hazardous Waste.

722.134a4(725.152d) - The Emergency Coordinators (EC) list needs address and phone numbers (office/home) of all persons qualified to act as EC).

722.34a4(725.152f) - Evacuation plan did not indicate signal to be used to begin excavation.

809.501(a) - Filters containing Molybdenum DiSulfide coating are not being manifested.

Facility Name: Techalloy Company, Inc.USEPA #: 005178975IEPA #: 1110930003**WASTE DISPOSITION
FORM**

HAZ	Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #				On Annual Report for: (Circle if present; cross out if not present)	Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
				* On 8700-12	* On 3510-3	* 1987	* 1988					
tank truck	Pickled liquor (spent acids)	from acid cleaning baths to remove scale	5/10/88 D002 D007			(G)	(G)	(G)	3000 gallons	3/13/90	Enviro-Tech Harvey, IL treatment [EPA 000666206]	
tank	Pickling rinse waters	from overflow and rinseate of coils between acid baths	5/10/88 D002 12/27/87 D007			(G)	(F)	(G)	5,000 gallons	3/16/90	Clean Harbors of Chicago, Inc. Chicago, IL treatment	
drums	ADS Sludge (solids)	from tank bottom of rinseate tank	12/89 D002 D007			(G)	(F)	(G)	~605 gals 2 mo. (varies)	3/8/90	Clean Harbors of Chicago, Inc. Chicago, IL treatment	
drum	used Plating filters	filters used for filtering plating tanks	5/13/86 D002 5/8/89 F008			(F)	(F)	(F)	110 gal. 4r (as needed)	3/19/90	Cyanokem Detroit, MI treat/dispose [MID098011992]	
	Non-HAZ					G	F	G				
	used filters	molybdenum disulfide coating process	— N/A			G	F	G	varies	none	General refuse McHenry County Landfill Cary, IL	
	SP-6 Sludge	soap coating on wires for drawing wire easily	11/19/88 N/A			G	F	G	165 gals 2-3 yrs.	3/8/90	Clean Harbors of Chicago, Inc. Chicago, IL treatment	
drums	Waste Oils	oils from drawing heavier wires - high viscosity →	N/A			G	F	G	2585 gal 4r.	3/21/90	Clean Harbors of Braintree, MA Braintree, MA inciner [MA053452637]	
drums	waste oils	water-soluble oils from cooling dies in machines	N/A			G	F	G	275 gals 4r (varies)	3/12/90	Clean Harbors of Chicago, Inc. Chicago, IL treatment [EPA 000608471]	
drums	waste oil	from vehicle maintenance (forklifts etc...)	N/A			G	F	G	1430 gals 4r.	3/12/90	American Chemical Service Grafton, IN fuel blend [IND016360265]	

* All "NO" responses must be explained in narrative.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

WASTE IDENTIFICATION

1. Does the facility handle the following wastes?

a. F001 through F005 spent solvents

Yes ☐ No ☒ List* _____

b. Dioxin-containing Wastes

Yes ☐ No ☒ List* _____

c. California List Wastes

Yes ☒ No ☐ List* D002 D007

d. First and Second Third Wastes

Yes ☒ No ☐ List* F008

* List wastes if room allows or attach Appendix A.

Note: Please be aware of potential misclassification of wastes (i.e., California list/"soft hammer"/characteristic waste applicabilities).

2. Does the facility handle the following wastes (national capacity variances)?

a. F001 - F005 contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action (effective date — 11/08/90).

Yes ☐ No ☒ Comments _____

b. Dioxin contaminated soil and debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

Yes ☐ No ☒ Comments _____

c. California list contaminated soil or debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).

Yes ☐ No ☒ Comments _____

- d. First Third wastes with the following waste codes: K048, K049, K050, K051, K052, or K071 (effective date - 08/08/90).

Yes ☐ No ☒ Comments _____

- e. First Third contaminated soil and debris which have a treatment standard based on incineration - K016, K018, K019, K020, K022, K024, K030, K037, K048-K052, K086, K087, K101, K102, K103, and K104 (effective date - 08/08/90).

Yes ☐ No ☒ Comments _____

- f. Second Third contaminated soil and debris which have a treatment standard based on incineration - F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U109, U221, U223, U235 (effective date - 06/08/91).

Yes ☐ No ☒ Comments _____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

Yes ☐ No ☐ NA ☒

If yes, check the appropriate treatability group.

- ☐ Wastewaters containing solvents (less than or equal to 1% total organic carbon (TOC) by weight)
☐ All other spent solvent wastes

2. First and Second Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

Yes ☐ No ☒ NA ☐

F008 Plating waste was being identified & manifested as D003

If yes, list the waste code and check the correct treatability group.

Waste Code	Wastewater*	Non-wastewater
F008		<input checked="" type="checkbox"/>

* Less than 1% TOC by weight and less than 1% filterable solids.

3. California List Wastes: Has the generator correctly identified the required treatment technology [268.42]?

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

Yes ☐ No ☐ NA ☒

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated [40 CFR 761.70] or disposed of by other approved alternate methods [40 CFR 761.60(e)]?

Yes ☐ No ☐ NA ☒

If an alternative method is used, specify the method and state whether the facility has received approval from the Regional Administrator or Director, Exposure Evaluation Division, for an exemption from the incineration requirement:

- c. For hazardous waste that contains halogenated organic compounds (HOCs) in total concentrations greater than or equal to 1,000 mg/L or 1,000 mg/Kg (except dilute HOC wastewater), is the waste incinerated in accordance with existing requirements of 40 CFR Part 264 Subpart O or 40 CFR Part 265 Subpart O?

Yes ☐ No ☐ NA ☒

4. Does the generator mix restricted wastes with different treatment standards?

Yes ☐ No ☒ Comments _____

If yes, did the generator select the most stringent treatment standards (268.41(b), 268.43(b))?

Yes ☐ No ☐ Comments _____

B. Waste Analysis

1. Does the generator determine whether the restricted waste exceeds treatment standards or prohibition levels at the point of generation by:

- Knowledge of waste Yes ☒ No ☐

List the wastes for which "applied knowledge" was used and describe the basis of the applied knowledge determination.

analysis of waste

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

Yes ☒ No ☐ (If no, go to b)

If yes, identify waste code and off-site treatment or storage facilities:

Waste Code	Facilities	Treat/Store
<u>D002 D007</u>	<u>Envirotek / Clean Tek Labs</u>	<u>Treat</u>
<u>F008, D003</u>	<u>Cyanokem</u>	<u>Treat</u>

see waste disposition

- Does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

Yes ☒ No ☐

- Does notification contain the following?

EPA Hazardous waste number(s) Yes ☐ No ☒

Applicable treatment standards and prohibition levels Yes ☒ No ☐

Manifest number Yes ☒ No ☐

Waste analysis data, if available Yes ☐ No ☒

NO ☒

- b. Does the facility ship any waste that meets the treatment standards to an off-site disposal facility?

Yes ☐ No ☒ (If no, go to c)

If yes, identify waste code and off-site disposal facilities:

Waste Code	Facility

F008 has no notification but

D002 D007 waste does

Was all supporting data retained on-site, [268.7(a)(5)]?

Yes ☐ No ☐

- TCLP Yes ☐ No ☐ NA ☒

List the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- Total constituent analysis Yes ☐ No ☐ NA ☒

List the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.

- pH ≤ 2 Yes ☒ No ☐ NA ☐

List the wastes for which pH testing was used.

D002, D007 - Pickling wastes

- Paint Filter Liquid Test Yes ☐ No ☐ NA ☒

List the wastes for which PFLT was used.

2. Does the facility dilute the restricted waste as a substitute for adequate treatment [268.3]?

Yes ☐ No ☒ NA ☐

C. Management

1. On-Site Management

Is restricted waste treated, stored for greater than 90 days, or disposed on-site?

Yes ☐ No ☒

Comments

D002, D007 waste has not been treated since 11/8/88 on-site - facility is required to go through RCRA closure for this unit - and the unit is on-standby if transporters are unable to service process tanks (see narrative)

If yes, the TSD Checklist must be completed.

- Does the facility provide notification and certification to the disposal facility [268.7(a)(2)]?

Yes ___ No ___

- Does notification contain the following?

EPA Hazardous waste number(s) Yes ___ No ___

Applicable treatment standards and prohibition levels Yes ___ No ___

Manifest number Yes ___ No ___

Waste analysis data, if available Yes ___ No ___

Certification that the waste meets treatment standards [wording in 268.7(a)(2)(ii)] Yes ___ No ___

- c. Is the waste subject to a nationwide variance, case-by-case extension (268.5), or no migration petition (268.6).

Yes ___ No ☒ (If no, go to d.)

- If yes, does the generator provide notification to the off-site receiving facility that the waste is not prohibited from land disposal [268.7(a)(3)]?

Yes ___ No ___

- Does the notification contain the following information?

EPA hazardous waste number Yes ___ No ___

The corresponding treatment standards and all applicable prohibitions Yes ___ No ___

Manifest number Yes ___ No ___

Waste analysis data, if available Yes ___ No ___

Date the waste is subject to the prohibitions Yes ___ No ___

- d. Does the facility generate any First or Second Third "soft hammer" waste?

Yes ___ No ☒ (If no, go to 4)

- Does the generator provide the following notification to the receiving facility with each shipment of waste [268.7(a)(4)]?

(i)	EPA hazardous waste number	Yes	___	No	___
(ii)	Applicable prohibition [268.33(f), 268.34(h)]	Yes	___	No	___
(iii)	Manifest number	Yes	___	No	___
(iv)	Waste analysis data, if available	Yes	___	No	___

3. "Soft Hammer" Demonstrations/Certifications

- a. Are any "soft hammer" wastes or treatment residues destined for ultimate disposal in a landfill or surface impoundment?

Yes ___ No ___

- b. Has the generator attempted to locate and contract with treatment and recovery facilities that provide treatment that yields the greatest environmental benefit [268.8(a)(1)]?

Yes ___ No ___

- c. Has the generator submitted a demonstration and certification to the Regional Administrator to document its efforts to locate practically available treatment [268.8(a)(2)]?

Yes ___ No ___

- If yes, did the generator submit the documentation and certification prior to first shipment?

Yes ___ No ___

- d. Does the demonstration contain the following information?

A list of facilities and facility officials contacted?

Yes ___ No ___

Addresses

Yes ___ No ___

Telephone numbers

Yes ___ No ___

Contact dates

Yes ___ No ___

Certification statement

Yes ___ No ___

Attach a copy of the demonstration and certification.

- e. If there is no practically available treatment, has the generator included with the demonstration, a written discussion of why the generator was not able to obtain treatment or recovery for that waste [268.8(a)(2)(i)]?

Yes ☐ No ☐ NA ☐

If yes, attach a copy of written discussion.

- f. Does the generator ship its "soft hammer" waste off-site for treatment?

Yes ☐ No ☐

Describe the type of treatment and treatment facilities:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Facility</u>
<hr/>	<hr/>	<hr/>
<hr/>	<hr/>	<hr/>
<hr/>	<hr/>	<hr/>

- g. Did the generator send a copy of its demonstration and certification to the receiving facility with the first shipment of waste?

Yes ☐ No ☐

- h. Does the generator provide certification with each subsequent shipment of wastes to receiving facilities?

Yes ☐ No ☐ NA ☐

4. Records Retention

Does the facility retain on-site copies of all notifications, demonstrations, and certifications for a period of 5 years [268.7(a)(6)]?

Yes ☐ No ☒

Comments notifications were kept only for 1990 manifests.

D. RCRA Corrective Action and CERCLA Response Action Waste

1. Has the facility disposed of contaminated soil and debris from a RCRA corrective action or a CERCLA response action in a landfill or surface impoundment?

Yes ☐ No ☒ Comments _____

2. Did the unit meet the minimum technology requirements (double liner, leachate collection system, and ground-water monitoring)?

Yes ☐ No ☐ NA ☐ Comments _____

E. Treatment Using RCRA 264/265 Exempt Units or Processes

1. Is waste treated in RCRA 264/265 exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

NA ☒ Yes ☐ No ☐ *No exempt units!*

List types of waste treatment units and processes:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment Units and Processes</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

2. Are treatment residuals generated from these units?

Yes ☐ No ☐ Comments _____

If yes, the residues are subject to the LDR generator requirements.

3. Are these residuals further treated, stored for greater than 90 days, or disposed on-site?

Yes ☐ No ☐ NA ☐ Comments _____

If yes, the TSD checklist must be completed.

ENVIRITE

LAND DISPOSAL NOTIFICATION/CERTIFICATION FORM FOR WASTES SENT TO ENVIRITE

Generator Name/Location: TECHALLOY CO. INC. - OLSON & JEFFERSON RDS UNION IL

Generator EPA ID #/Phone #: ILD005178975815-923-213 Manifest Document # per Item 1/Item A: 29926/332926

Envirite Waste Stream #s: 11 a. 2259 11 b. _____ 11 c. _____ 11 d. _____

SECTION 1: Restricted Wastes Requiring Treatment prior to Land Disposal

The purpose of this section is twofold: 1) to notify the facility specified on the referenced manifest that the waste(s) indicated does not meet the applicable treatment standards or does not comply with the applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d); 2) to apprise the referenced facility of the treatment standards set forth in 40 CFR Part 268 Subpart D and any applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). The subject waste's EPA hazardous waste number, applicable treatment standards, and regulatory and statutory prohibitions are referenced in Section 6 of this document. Please note that the more stringent standard applies where a waste mixture has two or more applicable treatment standards.

Printed Name: SCOTT CARR Signature/Date: SCOTT Carr 3-16-90

SECTION 2: Restricted Wastes That Can Be Land Disposed without Treatment

The purpose of this section is twofold: 1) to notify the facility specified on the referenced manifest that the waste(s) indicated can be land disposed without treatment; 2) to certify that the waste meets applicable treatment standards set forth in 40 CFR Part 268 Subpart D and the applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). The subject waste's EPA hazardous waste number, applicable treatment standards, and regulatory and statutory prohibitions are referenced in Section 6 of this document.

I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

Printed Name: _____ Signature/Date: _____

SECTION 3: Restricted Wastes That Have Been Treated and Can Be Land Disposed without Further Treatment

The purpose of this section is twofold: 1) to notify the facility specified on the referenced manifest that the waste(s) indicated has been treated and can be land disposed without further treatment; 2) to certify that the waste meets applicable treatment standards set forth in 40 CFR Part 268 Subpart D and the applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). The subject waste's EPA hazardous waste number, applicable treatment standards, and regulatory and statutory prohibitions are referenced in Section 6 of this document.

I certify under penalty of law that I personally have examined and am familiar with the treatment technology and operation of the treatment process used to support this certification and that, based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the performance levels specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d) without dilution of the prohibited waste. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

Printed Name: _____ Signature/Date: _____

SECTION 4: Case-by-Case Extension, Exemption, and/or Nationwide Capacity Variance

The purpose of this section is to notify the facility specified on the referenced manifest that the waste(s) indicated in Item 11 _____ is subject to one of the above captioned provisions. Attached hereto is the applicable notice.

Printed Name: _____ Signature/Date: _____

SECTION 5: Wastes for Which Treatment Standards Are Not Specified and Treatment Is Practically Available ("Soft Hammer")

The purpose of this section is to notify the facility specified on the referenced manifest that the generator has determined that there is practically available treatment for his waste prior to disposal and that the generator has accordingly taken two actions: 1) submits (or submitted) to the facility with the initial shipment of the subject waste(s) a copy of the demonstration and certification required in 40 CFR 268.8(a)(2)(ii); 2) provides the facility with the assurance that the conditions being certified have not changed. These statements and certification apply to the wastes referenced in Section 6 of this document. The subject waste's EPA hazardous waste number and any applicable regulatory and statutory prohibitions are referenced in Section 6 of this document.

I certify under penalty of law that the requirements of 40 CFR 268.8(a)(1) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environmental benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Printed Name: _____ Signature/Date: _____

(Complete PAGE 2 of this form by lifting up this page and folding it in the opposite direction along the perforation connecting first and second sheets. Insert carbon paper between the re-folded sheets with carbon paper face down on top of PAGE 2, which is marked "DUPLICATE FOR GENERATOR.")

SECTION 6: Identification of EPA Waste Type, Applicable Treatment Standards, and Regulatory/Statutory Prohibitions

The *EPA hazardous waste number* for the subject waste is indicated below by the manifest line-item number, which, in turn, corresponds to the waste's entry on the accompanying manifest. "Wastewaters" are wastes that contain less than 1% total organic carbon (TOC) and less than 1% total suspended solids (Nonfilterable Residue Test—Method No. 160.2 Methods for Chemical Analysis of Water and Wastes, EPA—600/4-79-020, March 1983). "Nonwastewaters" are those wastes that do not meet the definition of "Wastewaters."

NONWASTEWATERS				WASTEWATERS			
MANIFEST ITEM #(s)	EPA HAZARDOUS WASTE #	MANIFEST ITEM #(s)	EPA HAZARDOUS WASTE #	MANIFEST ITEM #(s)	EPA HAZARDOUS WASTE #	MANIFEST ITEM #(s)	EPA HAZARDOUS WASTE #
_____	F006	_____	K002*	_____	F006*	_____	K002*
_____	F007	_____	K003*	_____	F007	_____	K003*
_____	F008	_____	K004*	_____	F008	_____	K004*
_____	F009	_____	K005	_____	F009	_____	K005*
_____	F011	_____	K006*	_____	F011	_____	K006*
_____	F012	_____	K007	_____	F012	_____	K007*
_____	F019*	_____	K008*	_____	F019*	_____	K008
		_____	K062			_____	K062

*denotes a "Soft-Hammer" waste

*denotes a "Soft-Hammer" waste

The waste is (was) restricted because it does not (did not) meet applicable statutory/regulatory prohibitions. The following chart relates the subject waste (by manifest item #) to its applicable prohibition as noted by an "X."

MANIFEST ITEM #	pH ≤2	ARSENIC† ≥500 mg/l	CADMIUM† ≥100 mg/l	CHROMIUM VI† ≥500 mg/l	LEAD† ≥500 mg/l	MERCURY† ≥20 mg/l	NICKEL† ≥134 mg/l	SELENIUM† ≥100 mg/l	THALLIUM† ≥130 mg/l	FREE CYANIDES** ≥1000 mg/l
11 a.	X			X						
11 b.										
11 c.										
11 d.										

≤denotes "less than or equal to"; ≥denotes "greater than or equal to."

† in liquid hazardous wastes including free liquids associated with any solid or sludge containing this metal (or element) or compounds of same

**in liquid hazardous wastes including free liquids associated with any solid or sludge

Applicable Treatment Standards

The referenced treatment standards are expressed as *Constituent Concentrations in Waste Extract (CCWE)* and *Constituent Concentrations in Waste (CCW)*. Except for cyanides, concentrations are expressed as mg/l. Cyanide concentrations are expressed as mg/kg.

F006 NONWASTEWATERS		
	CCWE	CCW
Cadmium	0.066	*
Chromium (Total)	5.2	*
Lead	0.51	*
Nickel	0.32	*
Silver	0.072	*
Cyanides (Total)	590	
Cyanides (Amenable)	30	

F007, F008 & F009 NONWASTEWATERS		
	CCWE	CCW
Cadmium	0.066	*
Chromium (Total)	5.2	*
Lead	0.51	*
Nickel	0.32	*
Silver	0.072	*
Cyanides (Total)	590	
Cyanides (Amenable)	30	

F011 & F012 NONWASTEWATERS		
	CCWE	CCW
Cadmium	0.066	*
Chromium (Total)	5.2	*
Lead	0.51	*
Nickel	0.32	*
Silver	0.072	*
Cyanides (Total) ¹	110	
Cyanides (Amenable) ¹	9.1	

¹Effective 12/8/89; from 7/8/89 until 12/8/89, these wastes are subject to the same treatment standards as F007, F008 and F009 nonwastewaters.

K062 NONWASTEWATERS		
	CCWE	CCW
Chromium (Total)	0.094	*
Lead	0.37	*

F007, F008 & F009 WASTEWATERS		
	CCWE	CCW
Cyanides (Total)	*	1.9
Cyanides (Amenable)	*	0.10
Chromium (Total)	*	0.32
Lead	*	0.04
Nickel	*	0.44

K062 WASTEWATERS		
	CCWE	CCW
Chromium (Total)	*	0.32
Lead	*	0.04
Nickel	*	0.44

F011 & F012 WASTEWATERS		
	CCWE	CCW
Cyanides (Total)	*	1.9
Cyanides (Amenable)	*	0.10
Chromium (Total)	*	0.32
Lead	*	0.04
Nickel	*	0.44

*not specified

The above referenced wastes are also subject to the prohibitions stated in RCRA 3004(d) and 40 CFR 268.32.

(Now that you have completed this form, separate the two sheets of paper in the form by tearing along the perforated line. Retain the copy marked "DUPLICATE FOR GENERATOR" for your records. Forward the copy marked "ORIGINAL FOR RECEIVING FACILITY" to the receiving facility.)

ONLY FORMS WITH ORIGINAL SIGNATURES CAN BE ACCEPTED BY THE RECEIVING FACILITY!



**NOTICE AND CERTIFICATION FROM GENERATOR TO TREATMENT FACILITY
THAT WASTES DO NOT MEET LAND PROHIBITION TREATMENT STANDARDS**

The wastes identified on manifest number _____ are subject to the land disposal prohibitions of 40 CFR 268. The wastes do not meet the treatment standards specified in part 268 subpart D or do not meet the prohibitions specified in 268.32 or RCRA section 3004(d). The treatment standards or prohibition levels applicable to each waste is identified below:

Waste ID#	Applicable treatment standard or prohibition level	Waste ID#	Applicable treatment standard or prohibition level
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

A waste analysis for these wastes is included, where available.

Generator

Authorized Signature

Date

Typed/Printed Name

Title



Environmental Protection Agency

1701 S. First Street Maywood, IL. 60153

795

312/345-9780

Refer to: 11109003 - McHenry County - Union/Techalloy
ILD005178975

May 13, 1982

Techalloy Illinois, Inc.
P.O. Box 423
Union, Illinois 60180

Attn: George Miller

Dear Mr. Miller:

On April 21, 1982, representatives of the Illinois Environmental Protection Agency (IEPA) conducted an inspection of Techalloy, Inc.. This inspection was conducted by the Illinois Environmental Protection Agency under a Cooperative Arrangement with, and authorization of, the United States Environmental Protection Agency (USEPA). The purpose of the inspection was to determine your facility's compliance status with the Resource Conservation and Recovery Act (RCRA) of 1976, P.L. 94-580, as amended. During the inspection the following deficiencies were observed:

The owner/operator is required to develop and follow a written waste analysis plan pursuant to 40 CFR 265.13(b). The owner/operator was not able to provide such plan at the time of the inspection as required by 40 CFR 265.13(b).

Pursuant to 40 CFR 265.16(d)(3) a written description of the type of training to be given each person filling a position listed under 40 CFR 265.16(d)(1) is to be maintained at the facility. At the time of inspection a written description of the training outline was not available for review.

RECEIVED
MAY 17 1982
WASTE MANAGEMENT BRANCH
EPA, REGION V

You are hereby requested to submit to this office, within 15 days of receipt of this letter, a description of steps taken to correct the above deficiencies. Failure to correct these deficiencies may result in enforcement actions initiated by USEPA pursuant to 40 USC 6928. Please send your reply to the above address. Should you have any questions concerning this matter, please contact Brad Benning of my staff at the above number.

Sincerely,



Kenneth P. Bechely, Northern Region Manager
Field Operations Section
Division of Land Pollution Control

KPB:BPB:prb

Enclosure: Inspection Report

cc: Division File
Northern Region
U.S. E.P.A. - Region V

11109003

STATE IDENTIFICATION NUMBER
(If Applicable)IL 0005178975
EPA IDENTIFICATION NUMBERRCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility StandardsI. General Information:

- (A) Facility Name: Techalloy ILLINOIS Inc.
- (B) Street: Olson and Jefferson Roads
- (C) City: Union (D) State: IL (E) Zip Code: 60180
- (F) Phone: 815/923-2131 (G) County: McHenry
- (H) Operator: Techalloy Inc.
- (I) Street: Rt. 113
- (J) City: RAHNS (K) State: PA (L) Zip Code: 19426
- (M) Phone: 800-523-1777 (N) County: _____
- (O) Owner: - Same as above -
- (P) Street: _____
- (Q) City: _____ (R) State: _____ (S) Zip Code: _____
- (T) Phone: _____ (U) County: _____
- (V) Date of Inspection: 4-21-82 (W) Time of Inspection (From) 10:00am (To) 11:30am
- (X) Weather Conditions: 55° Clear

(Y) Person(s) Interviewed

Title

Telephone

George Miller

MAINT. Sup.

815/923-2131

(Z) Inspection Participants

Agency/Title

Telephone

BRAD Benning

IEPA/EP5

312/345-9780

(AA) Preparer Information

Name

Agency/Title

Telephone

BRAD Benning

IEPA/EP5

312/345-9780

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- ☒ A. Storage and/or Treatment
1. Containers (I)
 2. Tanks (J) ✓
 3. Surface Impoundments (K)
 4. Waste Piles (L)

☐ B. Land Treatment (M)

☐ C. Landfills (N)

☐ D. Incineration and/or Thermal Treatment (O and P)

☒ E. Chemical, Physical, and Biological Treatment (Q)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	—	—	✓	<u>N/A</u>
2. Facility expansion?	—	—	✓	<u>N/A</u>
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	✓	—	—	
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	—	✓	—	<u>NOT Documented</u>
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	—	—	✓	<u>HAZ. WASTE NOT accepted from off-site</u>
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	✓	—	—	<u>Video monitoring</u>
2. Artificial or natural barrier around facility?	✓	—	—	<u>Fence</u>
3. Controlled entry?	✓	—	—	<u>lockable Gates</u>
4. Danger sign(s) at entrance?	✓	—	—	
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	✓	—	—	<u>Inspection covers</u>
2. Records of operator error?	✓	—	—	<u>treatment area</u>
3. Records of discharges?	✓	—	—	<u>security and</u>

*Not Inspected

III. GENERAL FACILITY STANDARDS Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>safety devices</u>
5. Safety, emergency equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>and sludge box</u>
6. Security devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>-----</u>
7. Operating and structural devices?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>-----</u>
8. Inspection log?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>-----</u>
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>need to expand</u>
2. Job descriptions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>on specific area</u>
3. Description of training?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>where training</u>
4. Records of training?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>is received.</u>
5. Have facility personnel received required training by 5-19-81?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>-----</u>
6. Do new personnel receive required training within six months?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>-----</u>
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>waste is</u>
2. No smoking signs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>non-ignitable</u>
3. Separation and protection from ignition sources?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>non-reactive.</u>

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

(A) Maintenance and Operation of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?

Yes No NI* Remarks

— ☒ —

(B) If required, does the facility have the following equipment:

1. Internal communications or alarm systems?

☒ — —

Telephones, 2 way Rad

2. Telephone or 2-way radios at the scene of operations?

☒ — —

Telephone and alarm button at the treatment room.

3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?

☒ — —

Protective clothing eye-wash - shower soda ash - lime for spills.

Indicate the volume of water and/or foam available for fire control:

facility has own well but relays on Fire Dept.

fire exting. First Aid Kits.

(C) Testing and Maintenance of Emergency Equipment:

1. Has the owner or operator established testing and maintenance procedures for emergency equipment?

☒ — —

Monthly check of exting. Included in Insp. Sch.

2. Is emergency equipment maintained in operable conditions?

☒ — —

(D) Has owner or operator provided immediate access to internal alarms? (if needed)

☒ — —

Alarm button located in treatment room. w/- telephone.

(E) Is there adequate aisle space for unobstructed movement?

✓

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:

Yes No NI* Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

✓

✓

✓

✓

✓

Conting. Plan

is posted in
treatment room
and through out
the facility.

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?				
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>NO Emergencies</i>

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>no off-site</i>
2. Are records of past shipments retained for 3 years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>waste accepted.</i>
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

*Not Inspected

VI. RECORDKEEPING - Continued

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

✓

2. Does the operating record contain the following information:

- **b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

✓

- c. The location and quantity of each hazardous waste within the facility?

✓

- ***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

✓

N/A

- e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

✓

- f. Reports detailing all incidents that required implementation of the Contingency Plan?

✓

- g. All closure and post closure costs as applicable? (Effective 5-19-81)

✓

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Has this plan been submitted to the Regional Administrator	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Has closure begun?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. Is closure estimate available by May 19, 1981?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)				
	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name:	<u>Techalloy</u>		Date of Inspection:	<u>4-21-82</u>	
	Yes	No	NI*	Remarks	
1. Are containers in good condition?	<u>✓</u>	<u>—</u>	<u>—</u>	<u>waste sludge</u>	
2. Are containers compatible with waste in them?	<u>✓</u>	<u>—</u>	<u>—</u>	<u>is deposited in</u>	
3. Are containers stored closed?	<u>✓</u>	<u>—</u>	<u>—</u>	<u>Sludge boxes, supplied</u>	
4. Are containers managed to prevent leaks?	<u>✓</u>	<u>—</u>	<u>—</u>	<u>by hauling firms.</u>	
5. Are containers inspected weekly for leaks and defects?	<u>✓</u>	<u>—</u>	<u>—</u>	<u>facility tries to keep them covered.</u>	
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	<u>—</u>	<u>—</u>	<u>✓</u>	<u>non-ignitable</u> <u>" reactive</u>	

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	✓	N/A
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	---	---	✓	N/A

J
TANKS

Facility Name: _____ Date of Inspection: _____

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	---	---	---	-----
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	---	---	---	-----
3. Do continuous feed systems have a waste-feed cutoff?	---	---	---	-----
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?	---	---	---	-----
5. Are required daily and weekly inspections done?	---	---	---	-----
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	---	---	---	-----
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	---	---	---	-----

IV. Open Burning

A. Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI*	Remarks
1. Does this facility burn <u>only</u> waste explosives? (A <u>No</u> answer means <u>other</u> hazardous waste is open-burned.)	—	—	—	
2. If this facility open-burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	—	—	—	

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,001 to 30,000.....	690 m	2,260 ft

Q

CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name: Techalloy

Date of Inspection: 4-21-82

	Yes	No	NI*	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	✓	—	—	
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	—	—	✓	batch feed Process.

*Not Inspected

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Treat only one type of waste
4. Are inspection procedures followed according to 265.403?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Are the special requirements fulfilled for ignitable or reactive wastes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	N/A

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.2 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Name, mailing address, telephone number, and EPA ID Number of Generator	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. The total quantity of waste(s) and the type and number of containers loaded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Required signatures?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(C) Does the owner or operator submit exception reports when needed?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	WASTE is
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	transported in sludge boxes ~ 10-12 cu yds.
(C) If required, are placards available to transporters of hazardous waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	—	—	✓	<u>N/A</u>
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?	✓	—	—	<u>Removed weekly</u>
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	✓	—	—	—
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	—	—	—	<u>NO TANKS</u>
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	—	—	—	—
c. Do continuous feed systems have a waste-feed cutoff?	—	—	—	—
d. Are required daily and weekly inspections done?	—	—	—	—
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?)	—	—	—	—
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	—	—	—	—

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
(B) Has the generator submitted Annual Reports and Exception Reports as required?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<i>NOT Required yet</i>

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

Has the installation imported or exported Hazardous Waste?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
--	--------------------------	-------------------------------------	--------------------------	--

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
c. Met the Manifest requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

XI. REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

Techalloy manufactures wire by reducing its diameter by drawing it through dies. The incoming wire is dipped in acid baths to remove dirt and scale. The spent pickle solution (K062) is then neutralized, the solids are settled out, and the resulting water is returned to a floor pit under the acid baths where it normally will evaporate, the sludge ^(K063) goes through a press and is put into 55 gal drum and then taken out and

REMARKS: dumped into a Sludge box. The sludge is currently removed weekly by BFI to their landfill in Davis Junction. George Miller of Techalloy will be investigating the possibility of delisting K062 as previous analysis seem to show levels of Pb and Cr as below the EP Toxic levels. They may then only be neutralizing a corrosive (D002) waste and if the resulting sludge is not corrosive, it would not be considered hazardous. The facility was in compliance with the majority of the Interim Standards, and only needed to expand on their waste analysis plan and description of training given to personnel. Mr. Miller appears very knowledgeable of the operation, and very safety oriented.

L P C F C O 5 5 C
(1) (8) (9)

OBSERVATION REPORT - SITE INVENTORY NO.

CO. - L.P.C.

Region #

Date

(20) / / (25)

Letter Sent (Yes or No)

(26)

(Location)

(Responsible Party)

Samples Taken: Yes () No () Time: From : m

Weather

Ground Water() Surface() Other() To : m

Photos Taken: Yes () No () Interviewed

Inspector

(27) (29)

Previous Inspection

Previous Correspondence

Site Open: Yes() No()

OPERATIONAL STATUS:

TYPE OF OPERATION:

AUTHORIZATION:

Operating ()

Landfill ()

Storage ()

E.P.A. Permit ()

Temporarily Closed ()

Random Dump ()

Salvage ()

Variance ()

Closed Not Covered ()

Other ()

A.C.D. ()

21(e) ()

Closed and Covered ()

Quantity Received Daily(1-6)

(30)

Board Order ()

Illegal (5) ()

(31)

IMPROVED

LPC 4 1/79 5,000

SAME

DETERIORATED

I S or D

(62)

GENERAL REMARKS:

INTERVIEW:

DIAGRAM:

